

EXHIBIT "A"

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

SALLEY C. PURSER,

Plaintiff,

vs.

JOSEF F. BOEHM, ALLEN K.
BOLLING, LESLIE WILLIAMS,
JR., and BAMBI TYREE,

Defendants.

Case No. 3:05 CV 00085 JKS

VIDEO DEPOSITION OF SALLEY PURSER

Pages 1 - 156, inclusive

Tuesday, December 12, 2006
9:36 a.m.

Taken by Defendant
at
Hilton Hotel
500 W. 3rd Avenue
Anchorage, AK 99501

Reported by: Leonard J. DiPaolo,
Registered Professional Reporter

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1 APPEARANCES:

2 For Plaintiff: DARRYL L. JONES
 3 Law Office of Darryl Jones
 4 109 W. 6th Avenue, Suite 200
 5 Anchorage, AK 99501
 6 Ph: 278-1212

7 For Defendant Boehm:
 8 PAMELA SULLIVAN
 9 Wade, Kelly & Sullivan
 10 733 W. 4th Avenue, Suite 200
 11 Anchorage, AK 99501
 12 Ph: 561-7743

13 DAVID KENNER
 14 BRETT GREENFIELD
 15 Kenner Law Firm
 16 16000 Venture Boulevard, PH 1208
 17 Encino, CA 91364
 18 Ph: 818-995-1195

19 Also Present: Joseph Malatesta, Sr.,
 20 Deborah Bushue
 21 Monica Torrey
 22 John Ybarra
 23 Terry Shurtleff
 24 Eric Baldwin, Videographer
 25 Reported by: Leonard J. DiPaolo,
 Registered Professional Reporter

BE IT KNOWN that the aforementioned
 deposition was taken at the time and place duly noted on
 the title page, before Leonard J. DiPaolo, RPR, Registered
 Professional Reporter and Notary Public within and for the
 State of Alaska.

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1 PROCEEDINGS

2 VIDEOGRAPHER: We're on record approximately
 3 36 minutes past 9 a.m. This is the deposition of Salley
 4 Purser taken by defendants in the matter Purser versus
 5 Boehm, et al., case 3:05 CV 85 JKS.

6 We're at the Anchorage Hilton, 500
 7 W. 3rd Avenue, Anchorage, Alaska, Tuesday, December 12th
 8 2006.

9 My name is Eric Baldwin, video operator.
 10 The court reporter is Lenny DiPaolo. We represent Pacific
 11 Rim Reporting, 711 M Street, Anchorage, Alaska.

12 For the defendant appearing is David Kenner
 13 and Brett Greenfield with the Kenner Law Firm, and Pam
 14 Sullivan with Wade, Kelly & Sullivan. For witness is
 15 Darryl Jones.

16 I'll invite the court reporter to swear the
 17 witness at this time.

18 SALLEY PURSER,
 19 called as a witness herein, being first duly sworn to state
 20 the truth, the whole truth and nothing but the truth,
 21 testified as follows:

22 VIDEOGRAPHER: I'll ask if there are any
 23 stipulations or issues that need to be addressed?

24 MR. JONES: From our perspective, we would
 25 just like to remind the parties my client is pregnant.

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1 There is a seven hour maximum on these depositions by the
 2 rules, so you've got essentially seven hours. I'm not
 3 going to obviously hold the time against you, but from this
 4 point on we've got seven hours. If it runs a few minutes
 5 over, I'm not a real stickler for that, to be honest with
 6 you.

7 We'd also like to remind everyone of local
 8 Rule 30(e)(4) which regards to termination of deposition
 9 for anything that's unreasonably annoying, embarrassing, or
 10 oppressing to the deponent.

11 We recognize this is a sensitive case.

12 There is questions you're going to have to ask that are
 13 intimate and sensitive; that's not what I'm referring to.

14 I'm referring to aggressive behavior, stuff that's unduly
 15 oppressive, unnecessary stuff. But you'd hear my
 16 objection, of course, before I did anything of that nature,
 17 thank you.

18 MR. KENNER: Allow me just -- my
 19 understanding is that we sent the two letters confirming
 20 that the deposition would take place over two days, today
 21 and tomorrow, and that you confirmed that that would be the
 22 case.

23 MR. JONES: That's fine. The rules provide
 24 seven hours maximum for depositions. This woman is
 25 pregnant. Like I said, if this is something that runs a

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1 little bit over, that's fine. If this is something that's
 2 going to be to grind her down, then I'm going to adhere to
 3 the local rules. The judge holds our feet, I have found --
 4 based on some of his latest rulings, he's holding our feet
 5 to the fire pretty heavily on this.

6 I don't want to be unreasonable, obviously,
 7 to make you guys come all the way up here, and if you're
 8 just a little short finishing something, terminating, I
 9 wouldn't do that. But if it appears though this thing is
 10 just being drug out to grind her down, then we're going to
 11 adhere to the rules, and the rules are very specific, seven
 12 hours.

13 VIDEOGRAPHER: Mr. Jones, your microphone
 14 has just become dislodged. Thank you.

15 MR. KENNER: Well, I suppose then what we
 16 will probably do, in the interest of your client's
 17 condition, is to do maybe three-and-a-half hours or so
 18 today, or four hours, and do the balance of it tomorrow,
 19 which would probably be easier on her, I assume?

20 MR. JONES: As long as you think you'll get
 21 through. Like I said, I want to be fair on this thing. I
 22 don't want you to get up here and get half of what you need
 23 and run you off, that's not fair either. I just kind of
 24 want to remind you what the rule is.

25 MR. KENNER: I understand and I appreciate

Page 6

1 that.

2 EXAMINATION

3 BY MR. KENNER:

4 Q. Ms. Purser, have you ever had your deposition
5 taken before?

6 A. Never.

7 Q. Let me just, for the record, to make sure that you
8 understand, a deposition is a proceeding in which you're
9 under oath. It is the same as if we were in a courtroom
10 for purposes of your obligation to tell the truth, do you
11 understand that?

12 A. Yes, I do.

13 Q. Anything that you say in the course of this
14 deposition you'll have a chance to correct after you've
15 read it. And if you've made any mistakes, that's fine, but
16 we will be later be able to, if it's appropriate under the
17 rules of court at the time, to use statements that you've
18 made today in any trial that may occur, do you understand
19 that?

20 A. Yes.

21 Q. This proceeding, or this deposition is going to be
22 transcribed by the gentleman sitting next to you, the court
23 reporter. And what he transcribes will eventually be
24 reduced to a little booklet, and that booklet will have all
25 the questions that I've asked you, the objections and

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1 Q. And when did you start school there?

2 A. Kindergarten.

3 Q. And how long did you stay there?

4 A. Only kindergarten.

5 Q. And did you then leave to go to another school?

6 A. Yes, I did.

7 Q. Did you leave voluntarily?

8 A. Yeah, I moved.

9 Q. Where did you go to school next?

10 A. Tudor Elementary.

11 Q. Where is Tudor Elementary?

12 A. Off Lake Otis.

13 Q. How long did you go there?

14 A. Approximately four years.

15 Q. And when you left there, did you leave there
16 voluntarily?

17 A. Yes.

18 Q. Did you ever get in trouble there?

19 A. No.

20 Q. Where did you go to school after that?

21 A. Kasuun Elementary.

22 Q. How long were you there?

23 A. Two years.

24 Q. Can you spell the name of that school?

25 A. K-a-s-u-u-n.

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1 whatever statements counsel have to make, and your answers
2 to the questions. You'll be given that booklet at some
3 point and a chance to review the questions and your answers
4 and to make corrections, which an attorney can file and let
5 us know about and let the court know about, do you
6 understand that?

7 A. Yes, I do.

8 Q. Do you have any questions about this procedure?

9 A. No, I don't.

10 Q. Let me start with -- would you give us your full
11 name and spell it, for the record?

12 A. Salley Purser. S-a-l-l-e-y P-u-r-s-e-r.

13 Q. And your address?

14 A. 340 West 32nd, Apartment 12, Anchorage, Alaska
15 99503.

16 Q. Your telephone number?

17 A. 907-223-8148.

18 Q. And let me -- the next set of questions I'm going
19 to ask you about -- the first set of questions have to do
20 with your schooling and academic background.

21 So could you tell us the first school you
22 went to, please?

23 A. Taku Elementary.

24 Q. Do you know how to spell that?

25 A. T-a-k-u, I think. I'm not sure.

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1 Q. Was that the end of your elementary school?

2 A. Yes, that was.

3 Q. And up until that time, when elementary school was
4 over -- how old were you when you finished elementary
5 school?

6 A. 11 or 12. I'm not positive. I'd have to get a
7 calculator.

8 Q. And did you have any disciplinary problems at any
9 time prior to your completing elementary school at age 11
10 or 12?

11 A. No.

12 Q. And then you went to middle school of some sort?
13 I don't know what you call it here.

14 A. Middle school.

15 Q. And where did you go to middle school?

16 A. Hanshew Junior High.

17 Q. Can you spell that, please?

18 A. H-a-n-s-h-e-w.

19 Q. What years were you there?

20 A. 7th and 8th grade.

21 Q. And did you have any disciplinary problems there?

22 A. No.

23 Q. Were you using drugs at that point of any kind?

24 A. Occasionally smoking marijuana.

25 Q. When did you start occasionally smoking marijuana?

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1 A. 13. 12 or 13, I'm not positive.
 2 Q. So this would be after you were in elem -- after
 3 you were in middle school?
 4 A. Yeah, after junior high started.
 5 Q. And after the 8th grade did you change schools?
 6 A. Yes, I went on to high school.
 7 Q. What high school did you go to?
 8 A. Service High School.
 9 Q. And where is that?
 10 A. Off Abbott Loop Road.
 11 Q. What years were you there?
 12 A. I was only there three months for my 9th grade
 13 year.
 14 Q. And why did you leave there after three months?
 15 A. I left voluntarily.
 16 Q. When you say you left voluntarily, was there an
 17 incident that caused you to have to make that decision?
 18 A. No. I didn't want to go to high school up in
 19 Alaska anymore.
 20 Q. So did you drop out of high school then?
 21 A. Yes, I dropped out of Service.
 22 Q. Did you go to a different high school?
 23 A. Yes, I did.
 24 Q. And what high school was that?
 25 A. It was actually in Washington. Spokane,

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1 Washington.
 2 Q. The name of that?
 3 A. It was -- 9th grade is considered junior high
 4 still there, so it was Evergreen Junior High.
 5 Q. Now did your whole family move to Spokane,
 6 Washington?
 7 A. No.
 8 Q. Just you?
 9 A. Yes.
 10 Q. Did you live with your uncle at that time?
 11 A. My aunt and my uncle.
 12 Q. Can you give me the name of your uncle?
 13 A. Jay Harrison.
 14 Q. And do we have an address for Jay Harrison?
 15 A. No, I don't.
 16 Q. Is he around now someplace? Is he still alive?
 17 A. Yeah.
 18 Q. Is he still in Spokane?
 19 A. Yes.
 20 Q. Do you have a telephone number for him?
 21 A. No.
 22 Q. Do you have a way of getting his address?
 23 A. No -- well, I mean, I can get it if I want it.
 24 But I don't have it offhand right now.
 25 Q. Would you agree to provide that address to your

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1 attorney so that he could provide it to us?
 2 A. Yes.
 3 Q. And your aunt's name?
 4 A. Roberta Harrison.
 5 Q. And how long did you live with them in Spokane?
 6 A. About nine months.
 7 Q. Was there something that occurred that caused you
 8 to decide to leave the Alaska area and your mother and your
 9 brother to go to Spokane?
 10 A. Yes. Sorry to interrupt you. My mother was a
 11 drug addict and I didn't like staying at home anymore.
 12 Q. What age did you first become aware -- what age
 13 were you when you first became aware that your mother was
 14 drug addict?
 15 A. 14 or 15. 14.
 16 Q. Now when you say she was a drug addict, do you
 17 know what kind of drugs she was using?
 18 A. She was occasionally using cocaine.
 19 Q. You say "occasionally". How often was that?
 20 A. Every weekend.
 21 Q. Was she using cocaine with any particular person
 22 or persons?
 23 A. Not that I can remember.
 24 Q. So because of that cocaine use, you decided you
 25 were going to live with your aunt and your uncle?

Page 13

1 A. Yes.
 2 Q. And up to that, is it correct that the only drug
 3 experience that you've had yourself was to occasionally
 4 smoke marijuana?
 5 A. Yes.
 6 Q. Now when you went to Spokane, you went to school
 7 there for this nine months, did you have any problems in
 8 school there? Did you get in trouble for anything?
 9 A. Not in junior high.
 10 Q. Did you go to high school there?
 11 A. Yes, I did.
 12 Q. What high school did you go to there?
 13 A. Central Valley.
 14 Q. Did you get -- have any problems or get in any
 15 trouble at Central Valley High School?
 16 A. Yes, I did. I got suspended for suspected drug
 17 use.
 18 Q. And tell me about that. How did that come about?
 19 A. There was a rumor going around school that I used
 20 Ecstasy the weekend before.
 21 Q. Who were you supposed to have used Ecstasy with?
 22 A. I don't know, I didn't hear the rumor. I was just
 23 suspended by the vice principal because of suspected drug
 24 use.
 25 Q. And do you know the name of the vice principal?

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1 A. I don't remember it.
 2 Q. Did you do anything to contest this suspension?
 3 A. Can you --
 4 Q. Did you try to fight the suspension and say, "It's
 5 only a rumor"? Did you deny doing it?
 6 A. No, I did not.
 7 Q. What year was that?
 8 A. 2001 -- or, I was 15. 2001.
 9 Q. Did you smoke -- or use Ecstasy?
 10 A. Yes, I did.
 11 Q. So the rumor was true?
 12 A. Yes.
 13 Q. Who were you with when you used Ecstasy on that
 14 occasion?
 15 A. My roommate and a guy friend. I don't remember
 16 his name.
 17 Q. What was your roommate's name?
 18 A. Tawney Jones.
 19 Q. Can you spell that for us.
 20 A. T-a-w-n-e-y J-o --
 21 Q. Jones we have, thank you.
 22 And was that the first time you used
 23 Ecstasy?
 24 A. Yes.
 25 Q. And so at that point in your life you had smoked

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1 marijuana occasionally and used Ecstasy once?
 2 A. Yes.
 3 Q. Is that why you didn't fight the suspension,
 4 because you knew it was true?
 5 A. Yes.
 6 Q. And what did you do after you were suspended at
 7 that time?
 8 A. I was living with Tawney Jones at the time.
 9 Q. So you moved out from your aunt and uncle's?
 10 A. Yes.
 11 Q. When did you move out of your aunt and uncle's
 12 house?
 13 A. After nine months of being there.
 14 Q. You were still in junior high school then?
 15 A. No. I had graduated 9th grade before I left.
 16 Q. So you were in high school -- was this before the
 17 Ecstasy incident that you moved out of your --
 18 A. Yes. I moved out during the summer between 9th
 19 and 10th grade.
 20 Q. Why did you move out?
 21 A. Because I no longer wanted to live with my aunt
 22 and uncle.
 23 Q. Was there any -- anything that happened that made
 24 you not want to live with them?
 25 A. They were too strict.

Page 16

1 Q. Is that when you started to live with Tawney
 2 Jones?
 3 A. Yes.
 4 Q. Was that a boyfriend?
 5 A. No, it was a girl.
 6 Q. A girlfriend. Did you rent an apartment with her?
 7 A. No. I lived with her and her mother.
 8 Q. Did you do any drugs during the time you lived
 9 with her and her mother?
 10 A. No. Well, Ecstasy. Besides Ecstasy, no.
 11 Q. You say "besides Ecstasy". So after that first
 12 occasion which you used Ecstasy, you started to use Ecstasy
 13 on a more regular basis?
 14 A. No, no. After that incident and we both got
 15 suspended, her mother took me to a treatment facility and
 16 left me there. And from there I got on a plane and went
 17 back -- came back to Alaska and came home to my mother.
 18 Q. What treatment facility did she take you to?
 19 A. I don't remember.
 20 Q. Was it in Spokane?
 21 A. Yes. Well, you know, I don't even know. They
 22 drove me for a long time. I didn't know where I was. I
 23 just called my mom and she got me home. I didn't even stay
 24 there that long.
 25 Q. How long did you stay?

Page 17

1 A. I don't recall.
 2 Q. And did you undergo any treatment?
 3 A. Maybe three days' worth.
 4 Q. What did that treatment consist of?
 5 A. Just staying sober and reg -- like, groups that
 6 they had, and people would talk about their problems.
 7 Q. Were you taken there because you were having
 8 trouble staying sober?
 9 A. No, I was taken there so Tawney's mother could get
 10 rid of me because I was a bad influence on her daughter, so
 11 she thought.
 12 Q. What made think -- to your knowledge, do you have
 13 an opinion as to why she thought you were bad?
 14 A. Because we got in trouble. And Tawney told her
 15 mom it was my fault because she was scared.
 16 Q. What kind of trouble did you get in with Tawney?
 17 A. Getting suspended in school for using Ecstasy.
 18 Q. That goes back to the previous incident?
 19 A. This is all the same incident.
 20 Q. When you leave the treatment facility, you said
 21 you came back to Alaska?
 22 A. Yes.
 23 Q. How were you paying your expenses in Spokane?
 24 Were your aunt and uncle taking care of all of your
 25 expenses?

Page 18

1 A. While I was living with them?
 2 Q. Yes, while you were living with them.
 3 A. Yes.
 4 Q. Who paid to send you there? Did you take a plane?
 5 A. Yes. My aunt paid for it.
 6 Q. And who paid your expenses -- how long was it
 7 after you left your aunt and uncle that you were taken to
 8 this treatment facility?
 9 A. Four months, four or five months.
 10 Q. During that four or five months, who paid for your
 11 expenses?
 12 A. I had a part-time job as a telemarketer when I
 13 lived with Tawney.
 14 Q. How much did you make at this particular job?
 15 A. \$9 an hour.
 16 Q. What was the name of the company?
 17 A. I don't remember.
 18 Q. Do you know what city it was in?
 19 A. Spokane.
 20 Q. Do you have any paycheck stubs?
 21 A. No.
 22 Q. Were you paid with checks?
 23 A. You know, honestly I don't even think I -- I only
 24 had one paycheck before I got in trouble. I started
 25 working right after school started. And I --

Page 19

1 Q. I'm a little confused. I thought you got in
 2 trouble when you were still with your aunt and uncle?
 3 A. No. I got in trouble when I lived with Tawney.
 4 Q. Then you got one paycheck from this place?
 5 A. I don't even remember getting a paycheck from that
 6 place, it was so long ago.
 7 Q. So you don't have any recollection today of
 8 whether you made any money at this job?
 9 A. I know that I was getting paid \$9 an hour, and I
 10 know that I worked there for a while.
 11 Q. What's "a while"?
 12 A. I'd say two or three weeks. I don't remember
 13 exactly from date to date.
 14 Q. Did you put these checks -- did you have a bank
 15 account?
 16 A. No.
 17 Q. You cashed the checks someplace?
 18 A. Yes.
 19 Q. And you have no idea how much the checks were for?
 20 A. I was 15 years old. I got money, I didn't care.
 21 I went and bought clothes.
 22 Q. Were you doing any drugs at that time?
 23 A. No.
 24 Q. Did you have a boyfriend at that time?
 25 A. No.

Page 20

1 Q. So your life is essentially uneventful, other than
 2 this Ecstasy situation and going to this treatment
 3 facility, until you come back to Alaska?
 4 A. Yes.
 5 Q. When you come back to Alaska who pays for your
 6 did you fly back?
 7 A. Yes.
 8 Q. Who pays for your ticket?
 9 A. My mother.
 10 Q. And did you move back in with your mother then?
 11 A. Yes, I did.
 12 Q. And how old were you at that time?
 13 A. 15.
 14 Q. Where did you live with your mother then?
 15 A. 6650 Tiffany Terrace.
 16 Q. Was your mother still using drugs?
 17 A. Yes, she was.
 18 Q. Do you know what kind of drugs she was using?
 19 A. Crack cocaine.
 20 Q. Using it on a regular basis?
 21 A. Yes.
 22 Q. Did you start using crack cocaine?
 23 A. Yes, I did.
 24 Q. Did you start using it initially with your mother?
 25 A. Yes, I did.

Page 21

1 Q. How old were you when you first started using
 2 crack cocaine with your mother?
 3 A. 15.
 4 Q. And can you tell me what happened the first time?
 5 How did your mother get you to use crack cocaine, or why
 6 did she get you to do it, to your knowledge?
 7 A. I heard her on the phone telling somebody that she
 8 would meet them in a parking lot. I knew what she was
 9 going to do. And all I wanted was to get along with my mom
 10 again. You know, I wanted my mom back, so I told her I was
 11 going with her. And she told me, no, I wasn't. And I got
 12 in the car anyway. And we went down there, and that's
 13 where I first took my first crack hit.
 14 Q. Did you meet somebody there?
 15 A. Yes.
 16 Q. Who was that?
 17 A. Carl Bucher.
 18 Q. Did you develop a relationship with Carl Bucher?
 19 A. At one point.
 20 Q. At what point was that? How long after the time
 21 that you first met him?
 22 A. It was a matter of days. I don't even think it
 23 was a week. I met him that day with my mother and took my
 24 first crack hit with both of them. He got in the car, he
 25 gave my mom drugs, and we started smoking some. And then

Page 22

1 within that week I had smoked crack on two different
 2 occasions, once with my mom and Carl, and another with
 3 Carl.
 4 Q. How old was Carl at that time?
 5 A. I don't know.
 6 Q. Was he more than 20?
 7 A. Yes.
 8 Q. More than 30?
 9 A. I don't know.
 10 Q. When you -- after that week, did you continue to
 11 see him?
 12 A. No.
 13 Q. Was that the last time you saw him?
 14 A. Not the last time I've ever seen him, but the last
 15 time I used drugs with him.
 16 Q. Did you ever have sex with Carl Bucher?
 17 A. Yes, I did.
 18 Q. When was the first time you had sex with Carl
 19 Bucher?
 20 A. The only time I had sex with Carl Bucher was
 21 during that second event that I smoked crack with him.
 22 Q. In the car?
 23 A. No. The second time.
 24 Q. Where was that?
 25 A. At a hotel.

Page 23

1 Q. Who was -- was it just you and Carl?
 2 A. That I recall, yes.
 3 Q. So you smoked crack with him and your mother in
 4 the car. And then you meet him in a hotel?
 5 A. He came to my house, and I left with him to go get
 6 high and have fun.
 7 Q. That was only the second time that you got high?
 8 A. Uh-huh.
 9 Q. Was that because you enjoyed it so much the first
 10 time, getting high I mean?
 11 A. Yeah. I didn't enjoy it so much, but I liked the
 12 feeling.
 13 Q. You liked it enough that you wanted to do it again
 14 a few days later?
 15 A. Yes.
 16 Q. And did you know when you went to meet him that
 17 you were going to go to a hotel?
 18 A. No. He came to my house, I didn't go meet him.
 19 Q. Did he tell you before you got to the hotel you
 20 were going to the hotel?
 21 A. No.
 22 Q. So the next thing you know you're at a hotel?
 23 A. No, not right away.
 24 Q. At some point does he tell you, "We're going to go
 25 to a hotel and have sex"?

Page 24

1 A. He didn't straight up tell me, "We're going to go
 2 to a hotel and have sex." It just happened.
 3 Q. Did he tell you, "I'm going to take you to a
 4 hotel"?
 5 A. Yes.
 6 Q. And did you expect when you got to the hotel you
 7 were going to have sex with him?
 8 A. No, I did not, but it just happened.
 9 Q. While you were at the hotel you were high on
 10 crack?
 11 A. Yes.
 12 Q. When is the next -- so this is the first time,
 13 then, that you smoked crack with your mother, and at least
 14 smoking with Carl Bucher. Was that the first time you had
 15 sex?
 16 A. No.
 17 Q. When was the first time you had sex?
 18 MR. JONES: I'm going to object as to
 19 relevancy. But you can answer that.
 20 THE WITNESS: Do I have to answer it?
 21 MR. JONES: Yes, you should.
 22 THE WITNESS: What type of sex?
 23 BY MR. KENNER:
 24 Q. Any type of sex.
 25 A. There is a lot of types of sex.

Page 25

1 Q. Any type of sexual --
 2 A. People consider touching sex.
 3 Q. What is the first experience in your mind that you
 4 have that you think was a sexual experience?
 5 A. 14 years old.
 6 Q. And who was that with?
 7 A. Steven Abrams.
 8 Q. Were you using any drugs at that time?
 9 A. No.
 10 Q. And was the sex something less than what -- was it
 11 intercourse?
 12 A. Yes.
 13 Q. So when you said before, "what type of sex do I
 14 mean", was there some other experiences before this -- what
 15 was the person's name again, I'm sorry, that you had sex
 16 with at 14?
 17 A. Steven Abrams.
 18 Q. Do you know where he lives?
 19 A. No.
 20 Q. Have you seen him since you were 14?
 21 A. Yeah, once.
 22 Q. I'm sorry?
 23 A. Once.
 24 Q. How old was Abrams?
 25 A. 16.

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1 Q. When is the next time that you used drugs after
 2 the occasions with Carl Bucher and your mother?
 3 A. With Bambi and Josef.
 4 Q. So you never used drugs with your mother again
 5 before Josef?
 6 A. No.
 7 Q. Was your mother and Josef boyfriend and
 8 girlfriend?
 9 A. I don't know. I'm not the person to ask that
 10 question.
 11 Q. Well, did he come around the house and spend time
 12 with your mother, around the house while you were living
 13 with your mother?
 14 A. Yes, but this was after we both knew him for a
 15 period of time.
 16 Q. We'll come back to that in a few minutes. Was --
 17 tell me -- have you ever been arrested?
 18 A. Yes.
 19 Q. When was the first time you were ever arrested?
 20 A. Like for my juvenile record or as being --
 21 Q. Very first time you were arrested, when was that?
 22 A. I was 15 and I had taken my mother's car. I went
 23 over to a friend's house, I brought my brother with me, and
 24 she called my cell phone and my friend answered it and told
 25 her where I was. And she called the cops and we got

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1 arrested for stealing my mom's car and we went to juvenile
 2 hall for two or three days, I don't remember exactly how
 3 long.
 4 Q. When was the next time you were ever arrested?
 5 A. It would be in Seattle, Washington.
 6 Q. When was that?
 7 A. 2003 or -4, 2004, after I moved to Seattle with my
 8 mom with the trip that Josef paid for.
 9 Q. So between the arrest that you told us about when
 10 you stole your mother's car and the time you were in
 11 Seattle, you were never arrested?
 12 A. I don't recall being arrested or remember at this
 13 point in time.
 14 Q. Were you ever arrested for drug possession or
 15 sales?
 16 A. Yes.
 17 Q. Is that in Seattle?
 18 A. No, that was here in Anchorage.
 19 Q. Well, when was that?
 20 A. May 2005 -- no, -4, 2004. Two years ago.
 21 Q. The drug facility rehab place that you went to in
 22 Spokane, was that the only drug rehab place that you've
 23 been to?
 24 A. No.
 25 MR. JONES: Object. She didn't say it was a

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1 drug rehab, she said a treatment center. We don't know if
 2 it was alcohol or what it was.
 3 MR. KENNER: I apologize.
 4 BY MR. KENNER:
 5 Q. Have you been to any other treatment centers?
 6 A. Yes, I have.
 7 Q. Can you tell me, after the one in Spokane, what
 8 was the next treatment center you were at?
 9 A. Clitheroe.
 10 Q. How do you spell that?
 11 A. C-l-i-t-r-o-e [sic].
 12 Q. And where was that?
 13 A. The inpatient was out by the airport here in
 14 Anchorage, Alaska; and the outpatient was off Bragaw.
 15 Q. What caused you to go to that program?
 16 A. My getting arrested for drug possession.
 17 Q. So that was part of your sentence for the drug
 18 possession?
 19 A. Yes.
 20 Q. Were there any other treatment facilities that
 21 you've been to?
 22 A. No, not that I can recall to this day.
 23 Q. When did you start drinking alcohol?
 24 MR. JONES: I'm going to object, that
 25 assumes facts not in evidence at this point. You might

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1 want to ask if she ever drank alcohol.
 2 BY MR. KENNER:
 3 Q. Did you ever drink alcohol with your mother?
 4 A. No.
 5 Q. Did you ever drink alcohol with anybody?
 6 A. Yes.
 7 Q. Did you ever drink alcohol prior to you meeting
 8 Mr. Boehm?
 9 A. Yes.
 10 Q. When was that, when did you start?
 11 A. About the same time I started smoking marijuana.
 12 So around 14, around that age. I'm not positive. It was
 13 before Josef Boehm, but it was in junior high.
 14 Q. Did you continue to drink on a somewhat regular
 15 basis from that point?
 16 A. No. I occasionally drank alcohol. Very few, you
 17 know, times a month, if that. But I did not drink alcohol
 18 on a regular basis.
 19 Q. At some point did you live in a commune in Utah or
 20 in Seattle?
 21 A. What's a commune?
 22 Q. A place where there were a whole group of people
 23 living, a number of families living together.
 24 A. No, not that I know of. I don't know exactly what
 25 that is.

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1 Q. When you were at home with your mother, was your
2 father living there?
3 A. Until I was 9.
4 Q. Were there police called to the house because of
5 assaults by your father on your mother?
6 A. Yes.
7 Q. I think I asked you this before, but I just want
8 to be sure. Your testimony is after the crack cocaine
9 experience with Carl Bucher, you never did crack cocaine
10 again until after you knew Josef Boehm?
11 A. Yes, that I recall. I don't remember smoking
12 crack that often before I met Josef. I met him maybe two
13 weeks after that incident, two or three weeks after that
14 incident.
15 Q. Did you meet him through Bambi Tyree?
16 A. Yes, I did.
17 Q. How did you meet Bambi Tyree?
18 A. She was at my house with my mother.
19 Q. Was she a friend of your mother's?
20 A. Yes.
21 Q. Was she supplying drugs to your mom? Was she her
22 dealer?
23 A. You know, I don't know. I know that she had given
24 drugs to my mom. I don't know that my mom had ever
25 boughten drugs from her.

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1 Q. Did Bambi have a guy that she was with that was
2 selling drugs?
3 A. Many.
4 Q. At that time?
5 A. Not that I know of.
6 Q. What did you say, "many"?
7 A. Well, in the time that I've known her she's had
8 many boyfriends that are drug dealers.
9 Q. So -- excuse me. How did you meet Bambi?
10 A. She was at my house with my mother downstairs.
11 Q. Did your mother introduce you to her?
12 A. I don't remember essentially shaking her hand and
13 saying, "Hi, I'm Salley." But I remember seeing her in my
14 house a couple times before I even talked to her.
15 Q. And the times that you saw her in your house, was
16 she with anybody else?
17 A. Prior to meeting Josef?
18 Q. Yes.
19 A. Prior to introducing me to Josef?
20 Q. Prior to meeting Josef, yes.
21 A. Not that I recall. The only person that was in my
22 house the same time she was was Carl Bucher.
23 Q. Did you ever go out with Bambi before you met
24 Josef?
25 A. No. The only time -- the first time I left my

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1 house with Bambi she took me to a hotel, I sat in a van for
2 a half an hour, and then we took a cab to Josef's house.
3 Q. Was there any time when there was money stolen
4 from Carl Bucher?
5 A. Yes.
6 Q. And who stole the money from Carl Bucher?
7 A. Bambi.
8 Q. Is that the time that you were in the van?
9 A. Yes.
10 Q. So when you were in the van that you went to the
11 hotel with Bambi, Bambi had just stolen \$30,000 from Carl
12 Bucher?
13 A. I don't know about that much money. I only know
14 about 2 grand cash.
15 Q. Did you ever tell anybody that she stole \$30,000?
16 A. I don't recall telling anybody that she stole
17 \$30,000, but I heard of it.
18 Q. You heard she stole \$30,000 from Carl Bucher?
19 A. I heard that.
20 Q. And did you hear that that happened the night that
21 you were with her in the van?
22 A. Yes.
23 Q. Who did you hear that from?
24 A. My mother. She told me that I --
25 MR. JONES: Well --

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1 THE WITNESS: Okay.
2 MR. JONES: I was going to object, but I
3 can't object to you answering.
4 THE WITNESS: Sorry.
5 BY MR. KENNER:
6 Q. What was your understanding about -- did you have
7 an understanding about when this \$30,000 was stolen?
8 A. I really can't tell you any accurate information
9 on the \$30,000. I can tell you hearsay, and I would prefer
10 not to.
11 MR. JONES: You can't. That was going to be
12 my objection.
13 THE WITNESS: I can't tell you hearsay.
14 BY MR. KENNER:
15 Q. So when you got to the hotel, was it, when you sat
16 in the van for a half an hour?
17 A. Yes.
18 Q. And Bambi left the van and came back a half hour
19 later?
20 A. Yeah, between 20 minutes and 30 minutes later.
21 Q. And then you leave the van with her?
22 A. Yes.
23 Q. And did you go up to a hotel room?
24 A. Yes.
25 Q. Did you smoke crack in that hotel room?

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1 A. No.
 2 Q. Did you do any drugs in that hotel room?
 3 A. No.
 4 Q. Are you familiar -- are you aware of any occasion
 5 where your mother obtained crack cocaine in exchange for
 6 your having sex with somebody?
 7 A. No.
 8 Q. When you were living with your uncle in
 9 Washington, were you ever sexually assaulted by him?
 10 A. No.
 11 Q. Did you ever tell anybody you were?
 12 A. Yes.
 13 Q. Who did you tell you were sexually assaulted by
 14 your uncle in Washington?
 15 A. My mother.
 16 Q. That was a lie?
 17 A. Yeah, to my mom.
 18 Q. Why did you lie to your mother about that?
 19 A. Because I didn't like my uncle. He was strict.
 20 He enforced rules that were stupid. And it was all to keep
 21 me under his foot. And I wanted to come home and -- I
 22 don't know why I lied.
 23 Q. Well, do you recall having an interview with a
 24 psychologist, a Dr. Rose?
 25 A. Yeah.

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1 Q. Do you remember telling Dr. Rose that your uncle
 2 physically abused you in -- or sexually assaulted you,
 3 rather, in Washington?
 4 A. My uncle never physically sexually assaulted me.
 5 Q. Did you tell that to Dr. Rose?
 6 A. Not that I recall.
 7 Q. Did you ever tell the psychologist Dr. Rose that
 8 your uncle massaged you a table?
 9 A. Yeah.
 10 Q. Is your uncle a masseuse?
 11 A. No.
 12 Q. Why was he massaging you on a table?
 13 A. He offered to give me a back rub.
 14 Q. When you say he offered to give you a back rub,
 15 did you tell Dr. Rose that his hands were close to your
 16 vagina?
 17 A. Yes, I remember that.
 18 Q. Was that part of the back rub?
 19 A. He was massaging my leg.
 20 MR. JONES: I'm going to object, that calls
 21 for speculation.
 22 BY MR. KENNER:
 23 Q. Have you ever worked as a prostitute?
 24 A. No.
 25 Q. Have you ever had sex in exchange for drugs or

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1 money?
 2 A. What is your question?
 3 Q. Have you ever had sex in exchange for drugs or
 4 money?
 5 A. I have had sex and accepted drugs afterward.
 6 Q. When was that?
 7 A. While living with Josef.
 8 Q. How about Jay Whaley, did you ever have sex with
 9 Jay Whaley?
 10 A. Yes, I did.
 11 Q. Is Jay Whaley a drug dealer?
 12 A. Yes, he was.
 13 Q. Was Jay Whaley the owner of an escort service?
 14 A. Supposedly.
 15 Q. Were you living with Jay Whaley?
 16 A. Yes, I was.
 17 Q. Jay Whaley got arrested while you were living with
 18 him?
 19 A. Yes.
 20 Q. While he was in custody, were you taking care of
 21 his drug business for him?
 22 A. No.
 23 Q. Were you taking care of his escort business for
 24 him?
 25 A. No.

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1 Q. Were you having sex with him?
 2 A. Yes.
 3 Q. Was he giving you drugs?
 4 A. Yes.
 5 Q. Was he giving you money?
 6 A. No.
 7 Q. Was he paying for your rent and food?
 8 A. Yes.
 9 Q. Did you know Mr. Boehm at the time that you were
 10 living with Jay Whaley?
 11 A. Yes.
 12 Q. How old were you when you were living with Jay
 13 Whaley?
 14 A. 16, 16 or 17.
 15 Q. How old was Jay Whaley at the time?
 16 A. 30.
 17 Q. How long did you live with him?
 18 A. I don't recall exactly how long.
 19 Q. Did he ever supply drugs to your mother, to your
 20 knowledge?
 21 A. Yes.
 22 Q. Did he sell them to her?
 23 A. Yes.
 24 Q. How about Carl -- I'm sorry, we talked about that.
 25 Who is Gary D.?

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1 A. He was one of my mother's drug associates.
 2 Q. What is a drug associate?
 3 A. They smoked crack together on a regular basis.
 4 Q. Did you ever live with Gary D.?
 5 A. No.
 6 Q. Did you ever have sex with him?
 7 A. No.
 8 Q. Do you know Clarence, anybody named Clarence?
 9 A. Yes.
 10 Q. Who is Clarence?
 11 A. I barely knew him. He was a white guy that drove
 12 around in a cowboy hat, that's all I remember of Clarence.
 13 Q. Do you know his last name?
 14 A. No, I don't.
 15 Q. How about Pete Caldaron (ph)?
 16 A. Who?
 17 Q. Pete Caldaron?
 18 A. No.
 19 Q. You don't know him?
 20 A. No.
 21 Q. Did there come a time when you had an interview
 22 with Detective Boltz?
 23 A. Yes.
 24 Q. Was that in person or on the telephone?
 25 A. I don't recall. Maybe both.

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1 Q. When you had an interview with Detective Boltz,
 2 was the first one a recorded interview, to your knowledge?
 3 A. I'm not sure. I don't even remember that.
 4 Q. In addition to -- you do remember that you had an
 5 interview with him over the phone and one in person. Do
 6 you remember both of those things?
 7 A. I remember talking to Detective Boltz on the
 8 phone, and I remember meeting him when I flew up to Alaska
 9 and testified in Josef's grand jury.
 10 Q. Did you see him at the station when he took a
 11 statement from you?
 12 A. The police station?
 13 Q. Yes, before you testified at the grand jury? Did
 14 you talk to Detective Boltz about what you were going to
 15 testify about at the grand jury?
 16 A. Yes, I did.
 17 Q. And when did you do that?
 18 A. I don't recall. I can't --
 19 Q. How close to the time that you testified at the
 20 grand jury did you have the conversation with Detective
 21 Boltz?
 22 A. Honestly, I can't tell you an exact date. Before
 23 the grand jury. I don't remember.
 24 Q. Any time reference? Was it months, was it weeks?
 25 A. No. It was maybe a couple of days or weeks. I

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1 know that I talked to him -- I called him before I flew up
 2 there. And I flew up there while I was in juvenile
 3 detention in Seattle, and I did the grand jury for Mr.
 4 Boehm. I don't remember in between that frame time exactly
 5 when I talked to Steve Boltz.
 6 Q. Did you receive any assistance from either the
 7 government or Mr. Boltz in your case in Seattle, in getting
 8 that case resolved?
 9 A. No.
 10 Q. So I think we had gotten to the point where you
 11 said you smoked crack, and at some point you saw Mr. Boehm
 12 at your mother's house. Is that the first time you saw Mr.
 13 Boehm?
 14 A. No.
 15 Q. When was the first time you saw Mr. Boehm?
 16 A. When Bambi Tyree brought me to his house.
 17 Q. When did Bambi Tyree first bring you to his house?
 18 A. In October of '01, around that time. I know that
 19 there was snow outside and I just came back from Seattle --
 20 or Spokane, excuse me.
 21 Q. Do you have any recollection of meeting Mr. Boehm
 22 at your mother's house with Bambi and Bambi stealing \$2,000
 23 from Mr. Boehm while he was sleeping at your mother's
 24 house?
 25 A. Mr. Boehm?

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1 Q. Yes.
 2 A. I don't have recollection of that being Mr. Boehm.
 3 I remember that being --
 4 Q. Who was that?
 5 A. -- Carl Bucher, Bucher, whatever his name is.
 6 Q. Did that occur with Bambi before she took you to
 7 meet Mr. Boehm?
 8 A. Yes. That was the same night -- or same day.
 9 Q. So Bambi drives you to Mr. Boehm's house, is that
 10 correct?
 11 A. Yes.
 12 Q. And how many times had you seen Bambi prior to
 13 that?
 14 A. Very few.
 15 Q. Had you done drugs with her?
 16 A. No.
 17 Q. Had you talked about doing drugs with her?
 18 A. That's why we were leaving my house, to go get
 19 high.
 20 Q. You were leaving to go to Mr. Boehm's house to get
 21 high?
 22 A. I didn't know where she was taking me.
 23 Q. So you and Bambi wanted to get high, and she was
 24 going to take you someplace to make that happen, help make
 25 that happen?

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1 A. Yes. Bambi --
 2 Q. Did she tell you she was going to buy the drugs
 3 from somebody?
 4 A. I don't remember exactly what she told me she was
 5 going to do. She just asked me if I wanted to have some
 6 fun, and I went with her.
 7 Q. Did she tell you -- describe the kind of fun?
 8 A. Not exactly, no.
 9 Q. What did you think she meant when she said, "Do
 10 you want to have some fun?"
 11 A. I didn't really know. I had no expectations. I
 12 didn't know that, you know, I was -- I didn't know what was
 13 going to happen next, what would happen.
 14 Q. But you wanted to go with her to have some fun,
 15 whatever that meant?
 16 A. Yeah.
 17 Q. And you get to Mr. Boehm's house, is that correct?
 18 A. Yes.
 19 Q. And after you get to Mr. Boehm's house, did you do
 20 drugs?
 21 A. Yes.
 22 Q. And who supplied the drugs?
 23 A. Josef Boehm did.
 24 Q. And did you see Bambi give him any drugs?
 25 A. No.

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1 Q. Did Bambi do drugs?
 2 A. Yes.
 3 Q. You did drugs?
 4 A. Yes.
 5 Q. Mr. Boehm did drugs?
 6 A. Yes.
 7 Q. And then you left?
 8 A. We all left.
 9 Q. Who is "we all"?
 10 A. Bambi, Josef Boehm, and I.
 11 Q. Where did you go?
 12 A. We went to Fred Meyer and bought clothes, and then
 13 we went to the Microtel.
 14 Q. Do you ever remember -- let me start at this
 15 point.
 16 When is the first time you met Leslie
 17 Williams?
 18 A. I don't remember. Honestly, I can't tell you
 19 that.
 20 Q. When is the first time you met Allen Bolling?
 21 A. This was the time that I wasn't doing drugs very
 22 often, I wasn't at Josef's all the time. I went to go
 23 visit Bambi, she told me she would give me some money and
 24 she was at Josef's. I walked upstairs. Allen, a black man
 25 Allen, was sitting at the table. I didn't pay him any

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1 attention and I went to Josef's room. Bambi gave me \$200
 2 and I left. As I was leaving Allen smiled at me and waved
 3 his bag of dope, and that's the first time I ever met him.
 4 I didn't know his name then, I didn't know anything about
 5 him until later. But that was the first time I ever saw
 6 Allen Bolling. And I can't give you a date, I don't know.
 7 Q. Did you ever have a -- did you ever tell anybody
 8 that the first time you met Josef Boehm was at your house
 9 when Josef Boehm was asleep downstairs on your mom's bed?
 10 A. I don't recall telling anybody that.
 11 Q. Do you recall testifying in front of the grand
 12 jury?
 13 A. I think they are getting -- you know, I don't
 14 know. I might have. Also when I was -- when I did the
 15 grand jury, before I got arrested I was using drugs, I was
 16 still using drugs.
 17 And when I got arrested and went to juvenile
 18 hall I was detoxing. And when I did the grand jury -- I
 19 remember sitting in the room. I don't remember every
 20 single word I said. And I may have said that, but I don't
 21 recall saying that.
 22 Q. Do you remember on January 21st, 2004 at the grand
 23 jury being asked this.
 24 Question: Okay, let's talk about your first
 25 time meeting Mr. Boehm. How did that happen?

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1 And your answer being: I was at my house
 2 and I woke up and Bambi was there. And Carl, the guy that
 3 I had met Bambi through, was sleeping downstairs in my
 4 mom's room, and he had his pants -- he had his pants off
 5 but they were wrapped around his arm so nobody could take
 6 what was in his pockets. And Bambi and I had gotten his
 7 pants away from him and ended up stealing \$2,000 from him.
 8 And we left in his van that had \$30,000 in a suitcase in
 9 the back. And we went to the Holiday Inn Hotel downtown
 10 across from the Millennium Club.
 11 Do you remember being asked that question
 12 and giving that answer?
 13 A. Yes. That's Carl, not Josef Boehm. It says Carl,
 14 not Josef Boehm.
 15 Q. Okay. So you do remember, though, that there was
 16 \$30,000 in a suitcase?
 17 A. I remember being told. I never once saw a
 18 suitcase. I never once saw \$30,000.
 19 Q. Well, why did you testify that when you left in
 20 his van, the van had \$30,000 in a suitcase in the back, if
 21 you didn't know it?
 22 A. Because I was told that. You know, obviously I
 23 shouldn't have testified to it. I was young, you know, I
 24 did not know that you can't testify to something that
 25 you -- that I was told. I apologize for that, and I'm

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1 sorry that you have that information. But I can't sit
2 there and tell you that I knew there was \$30,000 in the van
3 today.

4 Q. Did you know you were under oath at the grand
5 jury --

6 A. Yes, I did.

7 Q. -- to tell the truth?

8 A. Yes.

9 Q. And were you telling the truth?

10 A. Yes, to the -- I should have stated that I was
11 told. I was only told there was \$30,000.

12 Q. So this is an incorrect answer is what you're
13 telling us then?

14 MR. JONES: I'm going to object. It calls
15 for a conclusion.

16 BY MR. KENNER:

17 Q. Was the statement that I just read to you, the
18 answer you gave in response to the question that I read, a
19 truthful answer or not?

20 A. It was the answer I gave.

21 Q. I understand that. But was it truthful when you
22 gave it? Are you telling us today that there were reasons
23 that caused you to give an untruthful answer?

24 A. I don't consider that untruthful. I was 17 years
25 old when I did that, okay. And being 17 years old, not

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1 Boehm?

2 A. He would bring over drugs every single day.

3 Q. Did you ever tell anybody that he brought an ounce
4 a day over for Mr. Boehm?

5 A. I might have.

6 Q. Was it true?

7 A. He was bringing drugs.

8 Q. Was it true that he brought an ounce a day of
9 cocaine for Mr. Boehm?

10 A. Yes, it very well could have been true.

11 MR. KENNER: Can I have just a moment,
12 please.

13 MR. JONES: Could we take a short break.

14 VIDEOGRAPHER: Off record, counsel, at
15 10:32.

16 (Off the record.)

17 VIDEOGRAPHER: We're back on record at
18 10:39. We begin tape 2. And in the interest of
19 completeness, let me identify also present appearances by
20 Joe Malatesta, Monica Torrey, John Ybarra, and Terry
21 Shurtleff.

22 MR. KENNER: Just so the record is clear,
23 when you say appearances, they are here.

24 VIDEOGRAPHER: Yes. Also present, thank
25 you, counsel.

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1 knowing the law, when I said that there was \$30,000 in the
2 back, I was told there was \$30,000 in the back. I should
3 have stated that I was only told and I did not see it.

4 Q. Who told you there was \$30,000 in the back?

5 A. My mother told me that \$30,000 was stolen from
6 Carl and I needed to bring it back. I did not know about
7 the \$30,000 until she told me. And then other people were
8 talking about it, too, and Carl was talking about it. And
9 I didn't want to, you know, get in that mess. But I never
10 once saw the \$30,000 or had anything to do with it.

11 Q. Was it true that you went to the Holiday Inn Hotel
12 in a van?

13 A. Yes, and waited outside for Bambi for like 20 to
14 30 minutes. She finally brought me up there and we left
15 right away because they were scared about how young I was.
16 And that's when we went to Josef's.

17 Q. Now when you testified at the grand jury -- let me
18 withdraw that.

19 Did Al Bolling bring an ounce of cocaine
20 every day for Josef Boehm during the time that you were
21 around Josef Boehm?

22 A. I wouldn't know how much every day. I would not
23 know exactly how much every day.

24 Q. Did you say -- did you ever tell anybody that
25 Allen Bolling would bring over an ounce a day for Josef

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1 MR. KENNER: At least as far as I know, the
2 people you just mentioned are not making appearances, but
3 they are present.

4 VIDEOGRAPHER: Thank you, counsel.

5 BY MR. KENNER:

6 Q. I'm sorry, I think we were asking about whether or
7 not you had said that Allen Bolling brought an ounce of
8 cocaine or more a day, okay. Is that a truthful statement?

9 A. I would like to review what I stated in my -- all
10 my testimony.

11 Q. Do you have a present recollection today of
12 whether or not that's true?

13 A. I don't even know what an ounce of dope is
14 anymore. I've been trying to forget about what happened to
15 me, okay. I know that Allen Bolling brought dope daily
16 over to Josef; if not, every other hour because he used so
17 much, okay. So I don't know exactly what an ounce is
18 anymore, so therefore today I can't tell you if he brought
19 that much.

20 Q. When you say you don't know what an ounce is, you
21 don't know what an ounce quantity of any substance is? You
22 don't know how much an ounce of anything is, is that what
23 you're telling me?

24 A. I mean, cocaine is different.

25 Q. An ounce of cocaine is different than an ounce of

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1 baby powder, other than the fact that, of course, that the
2 substance is difference?

3 A. I don't ever measure an ounce of baby powder, so I
4 wouldn't know.

5 Q. Did you used to measure the ounce of cocaine every
6 day?

7 A. No.

8 Q. When you say you would like to review, are you
9 telling me you have no present recollection of whether or
10 not you have ever made a statement under oath that you knew
11 for a fact that Allen daily would bring him, I believe that
12 refers to Mr. Boehm, over an ounce of cocaine, if not more?

13 A. As I told you before, I would like to review what
14 was in the paperwork that I stated.

15 Q. You need that to refresh your recollection as to
16 whether you said that?

17 A. I'd like to read the whole thing over again,
18 because that was --

19 Q. Ma'am, I understand you'd like to read it over
20 again, and that's fine that you'd like to read it over
21 again.

22 I'm asking you a question, and I'm asking if
23 you need to read this to refresh your recollection about
24 whether or not when you said it it was true?

25 A. If I said he brought an ounce of cocaine a day to

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1 Josef Boehm back in that time, and what I remembered from
2 then, yes, it was true.

3 Q. Let me try to get back to the chronological order
4 here. The date when you first meet Mr. Boehm is what,
5 approximately a year?

6 A. October '01, 2001.

7 Q. October of '01?

8 A. October of 2001 approximately. I'm guessing.

9 Q. And this is the first night that you go to the
10 hotel that you've been describing before, is that right?

11 A. Yes.

12 Q. And you did not go up to the hotel room, or you
13 did?

14 A. I did. When Bambi -- when we left my house and
15 went to the hotel first?

16 Q. Yes.

17 A. Yes, I did go up to the hotel room.

18 Q. And who was present there?

19 A. Tony Heffner and some other lady, I don't know her
20 name.

21 Q. And was your mother in that hotel room?

22 A. No.

23 Q. And what was Tony Heffner and this other person
24 doing?

25 A. I don't know. I wasn't in there long enough to

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1 figure it out.

2 Q. Did you see any drugs there?

3 A. No.

4 Q. What was the purpose of your going up there?

5 A. Bambi asked me to come up there.

6 Q. Why?

7 A. I don't know.

8 MR. JONES: Objection, calls for
9 speculation.

10 BY MR. KENNER:

11 Q. Did Bambi tell you why she wanted you to come up
12 there?

13 A. No, she didn't.

14 Q. Why did you leave so quickly?

15 A. To go up there? Or why did I leave the hotel so
16 quickly?

17 Q. To leave the hotel so quickly?

18 A. Bambi later told me that they were uncomfortable
19 with my age and how old I looked.

20 Q. Did she tell you why they were uncomfortable? Did
21 they want you to do something that they then got
22 uncomfortable about your age?

23 A. Can you clarify the question?

24 Q. Yes. When she said they got uncomfortable about
25 your age, were you aware of what they were uncomfortable

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1 about your age?

2 A. No.

3 Q. They just didn't like people your age? It made
4 them uncomfortable to be around people your age?

5 A. I don't know why they didn't like the fact that I
6 was in there.

7 Q. So you left there, you go to Mr. Boehm's house, is
8 that correct?

9 A. Yes.

10 Q. And at Mr. Boehm's house who is present?

11 A. Just Josef Boehm, Bambi Tyree, and myself.

12 Q. And how long do you stay there?

13 A. I'm guessing about around four hours. I don't
14 know for sure. When you're high on crack cocaine, you lose
15 track of time.

16 Q. Also affects your memory, as you told us before?

17 A. To an extent. It depends on how long you're on
18 it.

19 Q. How long were you on crack cocaine?

20 A. That day I started at Josef Boehm's house.

21 Q. You've done crack cocaine before?

22 A. I had done it before, but I was not high and on a
23 binge when I went to Josef's to meet him the first time.

24 Q. And after you smoked crack did anything else
25 happen before you went to Fred Meyer?

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1 A. No.
 2 Q. When you went to Fred Meyers were you still high?
 3 A. Yes.
 4 Q. And did Joe buy you some clothes there?
 5 A. Bambi did.
 6 Q. Bambi bought you clothes?
 7 A. Yes.
 8 Q. And Joe was there?
 9 A. He stayed in the car.
 10 Q. And then after you left there you went to the
 11 Microtel Hotel?
 12 A. Yes.
 13 Q. Did you go in?
 14 A. Yes.
 15 Q. And did you go into a room?
 16 A. Yes.
 17 Q. And who was in the room?
 18 A. Just Josef Boehm, Bambi Tyree, and myself.
 19 Q. And when you were -- how long did you stay in that
 20 room?
 21 A. I don't remember. A couple days maybe. I don't
 22 remember.
 23 Q. Did you smoke more crack cocaine?
 24 A. Yes.
 25 Q. Who is cooking the crack cocaine?

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1 A. It was already cooked.
 2 Q. And did you have any sex with anybody in that
 3 room?
 4 A. Yes.
 5 Q. And who was that?
 6 A. Josef Boehm.
 7 Q. And was that oral sex?
 8 A. Yes.
 9 Q. And was your mother present in the hotel room at
 10 that time?
 11 A. No.
 12 Q. Did you ever tell anybody that your mother was
 13 present in the hotel room the first time that you had oral
 14 sex with Josef Boehm?
 15 A. My mother did end up coming to that hotel room. I
 16 don't recall her ever seeing me give Josef oral sex. And I
 17 don't ever recall saying that, either.
 18 Q. When you were having oral sex with Mr. Boehm at
 19 the Microtel Hotel, was that in the bathroom?
 20 A. Yes.
 21 Q. Did your mother come in while you were doing that
 22 in the bathroom?
 23 A. I don't recall that.
 24 Q. Did you ever tell anybody that?
 25 A. I might have. I don't recall telling anybody

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1 that.
 2 Q. Was it true? Is it true? Did she come in there?
 3 A. My mother did come to the hotel. I don't remember
 4 her walking in on me giving Josef Boehm oral sex, but I
 5 remember my mother being at the hotel. I remember us all
 6 being in the bathroom smoking crack. But I really don't
 7 think that my mother would have allowed me to suck a
 8 60-year-old man's dick in front of her, high or not.
 9 Q. Did your mom get high with you in the room?
 10 A. Yes, she did.
 11 Q. Did you ever tell anybody that you were in the
 12 bathroom with Joe on this occasion and that Bambi opened
 13 the door because Mr. Boehm didn't feel you needed it
 14 locked, and she, referring to your mother, saw me?
 15 A. I don't remember saying that.
 16 Q. Was your mother aware that you were having oral
 17 sex with Mr. Bucher? She was there.
 18 A. No.
 19 Q. Was she aware of it?
 20 A. Back then, not that I recall. She knows of it
 21 now.
 22 Q. Do you remember telling somebody that Carl was a
 23 fucking sicko. He was the first guy you ever smoked crack
 24 with, and he forced me into some shit that Josef never even
 25 forced me into. That he was the first person that you

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1 traded sexual favors for money with?
 2 A. That doesn't sound like something that would come
 3 out of my mouth.
 4 Q. That doesn't sound like something that would come
 5 out of your mouth?
 6 A. No.
 7 Q. So you have no recollection of ever saying that?
 8 A. No. Can you state that again, what was said?
 9 MR. KENNER: Can that be read back?
 10 (Record read)
 11 THE WITNESS: I don't remember saying that.
 12 MR. JONES: Can we go off the record for
 13 just a second.
 14 VIDEOGRAPHER: Move off record, counsel, at
 15 10:52.
 16 (Off the record.)
 17 VIDEOGRAPHER: We are on record at 11:00
 18 a.m., thank you.
 19 BY MR. KENNER:
 20 Q. When we left off we were talking about a statement
 21 that you don't recall making.
 22 A. What statement was that?
 23 MR. KENNER: We can have it read back. It
 24 was the one just before we took a recess.
 25 (Record read)

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1 BY MR. KENNER:

2 Q. Okay.

3 A. I would have to review my grand jury transcripts
4 in order to give you an accurate answer.

5 Q. My question wasn't did you say that in front of
6 the grand jury, was question was did you ever make that
7 statement to anybody?

8 A. I don't remember saying that to anybody.

9 Q. Let me show you an interview that was conducted
10 with you on June 4th, 2004. And I would ask you to read
11 from line 23 on page 22 to line 18 on page 23. You can
12 show it to your counsel.

13 MR. JONES: We request an entire copy of the
14 transcript be made as an exhibit since it's being used for
15 this purpose. So you can take care of that, Eric?

16 THE WITNESS: Where do I read. Box 23?

17 BY MR. KENNER:

18 Q. Where I put a little mark next to it.

19 MR. YBARRA: There is a mark -- I'm sorry.

20 BY MR. KENNER:

21 Q. The top upper box.

22 A. To where do you want me to read?

23 Q. To the box below it where the next mark is.

24 A. Question: I agree --

25 Q. Read it to yourself and tell me if that refreshes

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1 your recollection about ever having made that statement.

2 A. Okay, I read it.

3 Q. Does that refresh your recollection about having
4 made that statement?

5 A. It does. And from the looks of how I was
6 speaking, and the language I used, I mean, and the date of
7 this, this was four days after I got arrested, so I was
8 detoxing.

9 I mean, I may have said it obviously, and if
10 I recall right you (indicating) were the one that took the
11 statement, right, whatever his name is.

12 So I -- yeah, at the time, I mean, coming
13 off drugs and being mad with anybody that had hurt me while
14 I was high or used me as a sex toy, I can see myself saying
15 that. So yes, I did say this.

16 Q. Was it true?

17 A. Carl is a sicko.

18 Q. Was what you just read there, does it refresh your
19 recollection about having made the statement? You told us
20 yes.

21 A. It refreshes it --

22 Q. Ma'am, ma'am. It does refresh your recollection,
23 correct?

24 A. Okay.

25 Q. Now that your recollection is refreshed, my next

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1 question is, is what your recollection refreshed about
2 true?

3 A. Yes. But I don't remember -- like, I vividly
4 don't remember exactly everything that happened with Carl.
5 It says he forced me into some shit that Josef never forced
6 me into. And everything that I have done with Carl I've
7 done with Josef, that I can remember, as of this day. So I
8 don't know why I said that, okay.

9 Q. So you don't know whether that's true --

10 MR. JONES: Can that be marked as an
11 exhibit?

12 MR. KENNER: These pages will be marked as
13 an exhibit.

14 THE WITNESS: It's true I said it.

15 MR. JONES: We need the entire transcript,
16 obviously. Everything has to be taken in context. So if
17 you're using any portion of it, we're entitled to the
18 entire copy.

19 MR. KENNER: The only reason that I'm using
20 it is to refresh her recollection. And now she's reviewing
21 the entire --

22 MR. JONES: Nevertheless, at least on record
23 I'm requesting a copy.

24 MR. KENNER: I understand that, and I'm not
25 telling you that I'm not going to give it to you. I'm

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1 simply telling you --

2 MR. JONES: I know.

3 BY MR. KENNER:

4 Q. I'm still trying to find out whether or not when
5 you made this statement was it true?

6 A. That was how I felt at the time.

7 Q. So that was your best recollection of what was the
8 truth at that time?

9 A. At that time. Obviously if that's what I said, I
10 mean, it's on paper. But yet I don't understand why I
11 would say something like that, because everything that I
12 had done with Carl I've done that and more with Josef, more
13 times, too.

14 Q. What did you do with Carl sexually?

15 A. Oral sex and -- yeah, oral sex. We might have had
16 intercourse. I can't picture it in my head, I don't
17 remember. There was just that one time I got high with
18 him.

19 Q. And in exchange for that oral sex and/or
20 intercourse you were getting crack cocaine from him?

21 A. We didn't make a deal, "If you suck my dick I'm
22 going to give you drugs." We were getting high, and me
23 being high and incoherent and the first time I used
24 drugs -- I mean, I don't know if I'm allowed to ask
25 questions, but --

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1 Q. No, you're not allowed to ask questions.

2 A. Well, obviously you don't know what it's like to
3 be high on crack cocaine.

4 Q. You're right.

5 A. So any decision making was definitely not
6 something that I was in my right mind. And I, you know,
7 had oral sex with Carl Bucher.

8 Q. You had oral sex with him because he had given you
9 crack cocaine, which put you in a state of mind that caused
10 you to do that?

11 A. I didn't care -- yes. I did not care about my
12 choices.

13 Q. Were you ever told by Detective Boltz that if you
14 didn't cooperate with his investigation and give him the
15 statements that he was looking for with regard to Mr.
16 Boehm, that you could just be a defendant as well?

17 A. No.

18 Q. So after this -- we're in 2001 in the van and
19 you're at Josef Boehm's house, correct?

20 A. Uh-huh.

21 Q. And then you go to the hotel and you're in the
22 bathroom with him and your mother comes in, correct?

23 A. Okay.

24 Q. Don't say okay. Is that correct?

25 A. Well, I mean, yeah, I'm in the bathroom smoking

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1 drugs with Josef. I call my mom to check in and tell her
2 where I'm at and she comes over. So yes, okay.

3 Q. Did you call your mom and tell her what you were
4 doing in the hotel room?

5 A. No.

6 Q. Did you tell her you were high?

7 A. No.

8 Q. Why did you want her to come over?

9 A. I hadn't seen her in a couple hours. I left
10 without telling her, and I wanted to check in. That's what
11 daughters are supposed to do.

12 Q. Let me understand this. You're high on crack
13 cocaine for several hours, you're in a hotel room, you're
14 giving somebody head in the bathroom, and you decide that
15 the right thing for a girl to do is to check in every
16 couple of hours with your mother, is that a fair statement
17 of what you said?

18 A. I didn't check in every couple hours. I called my
19 mom to let her know where I was at. You know, come to
20 think of it, Bambi might even have reminded me to call my
21 mother, okay.

22 Q. And did you tell your mother when you called that
23 you were high?

24 A. No. I wouldn't say that over the phone.

25 Q. When she got there --

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1 A. She knew. She knew who I was with. I told her I
2 was with Bambi. And I'm sure she assumed that I was using.

3 Q. So your mother knew that you were -- at that point
4 in your life were using crack cocaine with Bambi?

5 A. Yes.

6 Q. And she would use -- she, your mother, would use
7 crack cocaine with you and with Bambi?

8 A. Yes.

9 Q. So it wouldn't be unusual if you were using crack
10 cocaine to let your mother know, hey, I'm doing some crack,
11 see if she wanted to come and join?

12 MR. JONES: I'm going to object, calls for
13 speculation. You're assuming facts in [sic] evidence. She
14 never stated that she told her mom to come over. She
15 merely stated that she called and checked in with her
16 mother.

17 BY MR. KENNER:

18 Q. When you made that call, did you expect your
19 mother to come over?

20 A. I don't remember.

21 Q. Was your mother a crack addict at that time?

22 A. Yes.

23 Q. So if your mother knew that or believed that you
24 were with Bambi doing crack, would it have been your state
25 of mind that you would have expected her to want to come

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1 over and join in?

2 MR. JONES: I'm going to object again. That
3 calls for speculation.

4 MR. KENNER: Are you going to direct her not
5 to answer?

6 MR. JONES: You can answer if you want.
7 It's not going to be admissible, but go ahead.

8 THE WITNESS: I would never ask my mom to
9 join in with me and Josef or any sexual partner I had.

10 BY MR. KENNER:

11 Q. So when your mother does get there, does she start
12 using crack also?

13 A. Yes, she does.

14 Q. So now we've got you, your mother, Bambi, and
15 Josef using crack in this hotel?

16 A. Yes. Bambi's boyfriend Tony Heffner also showed
17 up.

18 Q. Did he show up to bring some more drugs?

19 A. I don't know.

20 Q. When you got there did somebody have drugs?

21 A. Josef had drugs.

22 Q. And how long did -- you said you were there for a
23 couple days?

24 A. I don't recall exactly how long I was there.

25 Q. Was your mother there for whatever time you were

Page 66

1 there?

2 A. No.

3 Q. How long --

4 A. Josef gave her some drugs, and I think she ended
5 up leaving because she didn't want to be there.

6 Q. When your mother got to the hotel you were already
7 in the bathroom with Joe, is that correct, with Josef?

8 A. I might have been. I don't remember exactly where
9 I was in the hotel room when she showed up.

10 Q. Do you remember being asked the question: "Did
11 she know what was going on in the bathroom with you and
12 Joe?" And we're referring to the incident we're talking
13 about at the hotel.

14 And you're answering: When she showed up
15 there I was in the bathroom with Joe, and Bambi opened the
16 door because he didn't feel we needed it locked, and she
17 saw me.

18 Do you recall being asked that question and
19 giving that --

20 A. Yeah, I'm sure she saw me in the bathroom with
21 Josef. She came into the bathroom. That doesn't mean she
22 saw me giving him oral sex in the bathroom.

23 Q. And you've seen -- I'm sorry, is it true that you
24 have been to a hotel, regardless of who with, approximately
25 a total of 12 times?

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1 A. With what intent?

2 Q. Well, do you remember being asked the question:
3 "Around how many times have you been there..." referring to
4 the hotel, "...with Joe about?"

5 And your answer: With -- with Joe?

6 Question: Or with anybody?

7 Answer: I'd say I've been about a total of
8 12 times.

9 Question: Okay.

10 Answer: And with Joe between six and eight.

11 A. Okay, yes, I remember saying that.

12 Q. Is that accurate?

13 A. Yes.

14 Q. Who were you there with the times that you weren't
15 there with Joe?

16 A. With Bambi. With -- I've been in hotel rooms with
17 Jay Whaley. I was in a hotel room with Carl when that
18 happened. Mostly they were with Josef.

19 Q. Well, about --

20 A. Four of them weren't. So, I mean, the only other
21 people --

22 Q. Four to six weren't?

23 A. The only other people that I've been in hotel
24 rooms with are, using drugs, is Bambi, Jay Whaley, Carl,
25 and that's all I can think of.

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1 Q. Was there an occasion when you were in a hotel
2 with Josef and your mother came over and you got in an
3 argument with her and threw her out of the room, do you
4 recall that?

5 A. I remember arguing with my mother a lot.

6 Q. Do you remember throwing her out of the room
7 without any clothes on, naked?

8 A. No.

9 Q. Do you remember telling anybody that?

10 A. No.

11 Q. After that occasion, when was the next time that
12 you -- or let me withdraw that.

13 Did you go back to your mom's house after
14 the several days in the hotel?

15 A. Yes, I went home.

16 Q. Is that where you were living at that time?

17 A. Yes.

18 Q. And who else was living there then?

19 A. My brother.

20 Q. Paxton?

21 A. Yes.

22 Q. And your mother was still doing crack cocaine
23 while you were living there?

24 A. Yes.

25 Q. And you were still doing crack cocaine with your

Page 69

1 mother while you were living there?

2 A. Occasionally.

3 Q. Where were you getting the crack cocaine you were
4 doing at home with your mom?

5 A. I didn't do it all the time with her. I mean --

6 Q. Well, the times that you know about that she did
7 it, do you know where the crack cocaine came from?

8 A. No. I was just getting it from my mother.

9 Q. How long did that go on, that you were living at
10 home doing crack cocaine occasionally with your mother?

11 A. Almost a year. And then I moved out.

12 Q. So that would be until about 2002?

13 A. Around 2002, in that year I moved out. I got
14 sober. I moved in with a boyfriend.

15 Q. You got sober. How did you get sober?

16 A. I quit using drugs. I didn't want to --

17 Q. Did you go to a program or you just did it
18 yourself?

19 A. No, I just decided I didn't want to use.

20 Q. And when you moved out, was that when you moved in
21 with Jay Whaley?

22 A. No.

23 Q. Where did you move to in 2002 when you moved out
24 and you weren't using drugs?

25 A. I moved to a boyfriend's house named Josh

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1 Williams.
 2 Q. Did Josh Williams use drugs?
 3 A. No.
 4 Q. How old was Josh Williams?
 5 A. 20.
 6 Q. Where did you live with him?
 7 A. At his mom's house.
 8 Q. Where was that?
 9 A. I don't know the address.
 10 Q. How long did you live there with him?
 11 A. Maybe three months.
 12 Q. What city was that?
 13 A. Anchorage, Alaska.
 14 Q. What part of 2002 was that?
 15 A. I can't recall exactly.
 16 Q. Was it summertime?
 17 A. Summertime.
 18 Q. What happened that caused you to move out of his
 19 house?
 20 A. We broke up.
 21 Q. During the time that you were at Josh Williams'
 22 house you were not doing any drugs?
 23 A. No. I was occasionally using marijuana.
 24 Q. Were you seeing Bambi?
 25 A. No.

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1 Q. When you broke up with him, did you go back to
 2 your mom's house?
 3 A. Yes, I did.
 4 Q. Was Paxton still living there?
 5 A. Yes.
 6 Q. Was your mom living with anybody then, besides
 7 Paxton?
 8 A. No.
 9 Q. Your mom was still using crack cocaine?
 10 A. Yes.
 11 Q. And did you start using crack cocaine again with
 12 your mom?
 13 A. Actually I started -- when I came home and brought
 14 my stuff Josef was there with my mother, and he came up to
 15 my room.
 16 Q. So Josef had some relationship with your mother,
 17 is that true? Are you aware of that?
 18 A. Yes.
 19 Q. Was he kind of like her boyfriend for a while?
 20 A. I don't know.
 21 MR. JONES: I'm going to object. That's
 22 been asked and answered.
 23 BY MR. KENNER:
 24 Q. So you come home and Josef is there and you do
 25 crack with them?

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1 A. Yes.
 2 Q. Correct?
 3 A. Yes.
 4 Q. How long did you live with your mother during this
 5 stretch?
 6 A. By this time it was off and on, because I was
 7 never home. This time that I relapsed I didn't just use
 8 every once in a while, I was using all the time. I stayed
 9 with Josef and Bambi, or Josef or Bambi, and I was always
 10 getting high. I stayed at Josef's house a lot. I stayed
 11 in different hotel rooms for a while.
 12 Q. How long did that go on? Did that go on until you
 13 went to Seattle?
 14 A. Yes.
 15 Q. So from the summer of 2002 until you went to
 16 Seattle, you were living in a variety of rooms -- when I
 17 say "living", you were staying at a variety of locations,
 18 sometimes at Mr. Boehm's house, sometimes at Ms. Tyree's
 19 house, sometimes in hotel rooms?
 20 A. Mostly at Josef's.
 21 Q. Now when you were mostly at Josef's house, were
 22 there other people staying there at the same time?
 23 A. Bambi would come stay. You know, I mean when we
 24 were all there we were there for days at a time getting
 25 high. And some people would leave and some people

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1 wouldn't.
 2 Q. So when you felt like leaving you'd leave, when
 3 you felt like coming back you'd come back, is that correct?
 4 A. Not really. I never really -- I mean, I never
 5 felt like leaving. I didn't want to leave.
 6 Q. Well, then why did you leave to go to stay at
 7 Bambi's house sometimes and why did you leave to --
 8 A. Because I needed the air, fresh air. Being locked
 9 in that house on drugs you get stuck is what they call it.
 10 Q. When you say "being locked in that house", are you
 11 telling us that you were locked in the house and not
 12 allowed to leave?
 13 A. Yeah, by a security alarm a lot. You even open a
 14 window and it goes off.
 15 Q. Did you ever break into the house?
 16 A. Yes, I have. I've never broke into it, I've
 17 climbed in the window.
 18 Q. Now the security alarm that you're talking about,
 19 if you would have opened the door and left, it just would
 20 have set off an alarm, correct?
 21 A. Yeah, and the cops would be called and they would
 22 show up if nobody answered the phone and gave them the
 23 password or whatever it was.
 24 Q. So if you wanted to get out of there and wanted
 25 help, you could have gotten help from the police any time

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1 you wanted by opening any one of the doors and walking out,
 2 correct?
 3 A. Yes.
 4 Q. Didn't there come a time at which the alarm didn't
 5 even work?
 6 A. Not that I know of.
 7 Q. And is it your testimony today that the reason
 8 that you didn't leave there or were struck there was
 9 because you were afraid to set the alarm off?
 10 A. That, and Josef would tell me that people were
 11 trying to hurt me.
 12 Q. Who did Josef tell you was trying to hurt you?
 13 A. Various different people. Bambi would tell me,
 14 too. I cannot remember exact names or persons. All I know
 15 is with the paranoia that comes with crack cocaine use, it
 16 wasn't a good mix with the fact that somebody was telling
 17 me somebody was out to hurt me.
 18 Q. It wasn't Joe that was out to hurt you, was it?
 19 Joe never threatened you, did he?
 20 A. Joe's hit me before.
 21 Q. Did Joe ever threaten you?
 22 A. In what way? I mean, he's never threatened to
 23 kill me, but he has --
 24 Q. You say Josef has hit you before?
 25 A. Yes, he has.

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1 Q. And has he ever threatened you in any way?
 2 A. Not that I can remember to this day. He might
 3 have.
 4 MR. KENNER: May I have just a moment,
 5 please.
 6 BY MR. KENNER:
 7 Q. So when you say Josef hit you, when did he do
 8 that?
 9 A. Right after he accused me of stealing his money
 10 and I was getting into somebody's car.
 11 Q. And you did steal some of his money?
 12 A. I did steal some money.
 13 Q. And you were leaving with the stolen money to get
 14 in a car?
 15 A. He wouldn't let me have it. I left because he was
 16 violent and irrational and freaking out.
 17 Q. Because you stole his money?
 18 A. I attempted to steal his money.
 19 Q. So other than the time when you attempted to steal
 20 his money, he never hit you?
 21 A. Huh-uh, not that I know of.
 22 Q. And, in fact, he was nice, is that correct, nice
 23 to you?
 24 A. Yeah, when he wanted, you know, oral sex or any
 25 type of sex he was nice.

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1 Q. Was he respectful to you?
 2 A. Half the time.
 3 Q. I'm sorry?
 4 A. Half the time.
 5 Q. Did you think he had a good heart?
 6 A. I don't think he had -- how do I answer that?
 7 Q. Did you ever testify --
 8 A. Yes, I know exactly what you're talking about,
 9 saying that he had a good heart and I felt sorry for him.
 10 And at the point at that time I did feel sorry for him
 11 because I was under -- Josef and I would talk when we would
 12 get high about what Bambi, Allen, and Leslie were doing to
 13 him, some conspiracy, and I would feel sorry for him. And
 14 to this day I don't believe in that conspiracy anymore, and
 15 I don't feel sorry for him anymore.
 16 Q. But at the time you testified in front of the
 17 grand jury, you felt that behind the drugs and everything
 18 that was going on he had a good heart?
 19 A. Yes, I did testify that.
 20 Q. Was it true at the time you testified to it?
 21 A. Yes.
 22 Q. And that he was respectful, that was true?
 23 A. For the most part. Half the time, yeah.
 24 Q. Now you indicated just now that you had
 25 conversations with Josef about there being a conspiracy

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1 against him, and that conspiracy consisted of Leslie
 2 Williams, Allen Bolling, and Bambi Tyree, is that correct?
 3 A. Yes.
 4 Q. And, in fact, that's what you told Detective
 5 Boltz, isn't it?
 6 A. Yes.
 7 Q. You told him that they were all after Josef's
 8 money?
 9 A. Yes.
 10 Q. Did you feel that Mr. Boehm was just as much a
 11 victim as you were in terms of what was going on during
 12 that period of time?
 13 A. I recall saying that. I don't feel that way
 14 today.
 15 Q. I'm not asking you how you feel today. I'm asking
 16 you, did you ever tell anybody -- or let me withdraw that.
 17 Did you, in June of 2004, believe that Mr.
 18 Boehm was just as much a victim as you were?
 19 A. I believed that back then, yes, I did.
 20 Q. And did you tell that to Detective Boltz?
 21 A. I don't remember who I said it to.
 22 Q. Did you believe in 2004 that -- let me withdraw
 23 that.
 24 Did you find out sometime that Allen
 25 Bolling, Bambi Tyree, and Leslie Williams were in cahoots

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1 and were operating behind Josef Boehm's back?

2 A. Operating to do what behind his back is the
3 question.

4 Q. Did you ever say that -- did you ever testify to
5 that?

6 A. I very well might have, yes.

7 Q. Do you need to refresh your recollection to be
8 sure that you did, or do you remember testifying?

9 A. I remember saying something like that.

10 Q. Do you remember saying that, or something like
11 that?

12 A. That they were in cahoots behind Josef's back,
13 yes.

14 Q. That the other three were?

15 A. Uh-huh.

16 Q. Do you remember -- let me withdraw that.

17 In September of 2004, was it your belief
18 that Bambi Tyree was in charge of bringing girls, and she
19 was the one that brought you to Josef Boehm's, and that she
20 was the one who told you to get naked, and she was the one
21 who told you to make him happy so that you and Bambi could
22 get certain things from him?

23 A. Yeah, she told me that, after getting directions
24 from Josef Boehm to do so.

25 Q. Do you remember saying that if it wasn't for

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1 Bambi, none of this would have happened?

2 A. I remember saying that.

3 Q. Did Bambi Tyree put things in Josef Boehm's food
4 to cause him to pass out?

5 A. Not that I know of.

6 Q. Did you ever tell anybody that?

7 A. I might have.

8 Q. If you told them that, would it have been true
9 when you said it? Did you ever say that in September of
10 2004?

11 A. Due to the fact that I was detoxing off of drugs
12 and had the same conspiracy in my head that people were
13 drugging me and knocking me out, putting stuff in my drink
14 and food, I'm sure I said that.

15 Q. In addition to your belief that Bambi Tyree, Allen
16 Bolling, and Leslie Williams were plotting against Josef
17 Boehm, did you ever witness them stealing from him when he
18 was asleep?

19 A. I witnessed Bambi stealing from him, that's it.

20 Q. Did you ever say -- do you remember testifying --
21 or let me withdraw that.

22 Do you remember sitting in the corner and
23 laying on the bed half asleep and hearing Leslie Williams,
24 Al Bolling, and Bambi Tyree talk about taking things from
25 Mr. Boehm while he was asleep?

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1 A. I don't recall that.

2 Q. Do you ever remember telling Mr. Boehm that they
3 were going to take things from him, and yourself putting
4 things of his in a place where you thought that they
5 wouldn't find them?

6 A. Myself putting things, his things?

7 Q. Yes.

8 A. I might have said that while I was using drugs.

9 To Josef Boehm I might have said that?

10 Q. Did you testify that that's what you did?

11 A. Can you clarify that again? Will you say that
12 again?

13 Q. Yes. Do you remember being asked the question,
14 when you were talking about these other three people that
15 we've been talking about, Bolling, Williams, and Tyree
16 doing things behind Joe's back, do you remember being asked
17 the question: What kind of things were they doing?

18 Your answer: Well, like Bambi had
19 planned -- you know, she was planning to take -- to take
20 what -- when he fell asleep -- he had been up for a long
21 time, and when he fell asleep she was planning to take his
22 car and what he had in his pocket, however much money and
23 dope it was, and I let him know and put his stuff up in a
24 place that she would never find it.

25 MR. JONES: I'm going to object as to vague.

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1 You need to describe who is asking these questions and the
2 circumstances, not just a generality of statements of
3 answers and questions. In other words, if this was at the
4 grand jury, say, "At the grand jury did you testify?"

5 BY MR. KENNER:

6 Q. Did you testify to that at the grand jury?

7 A. Yeah. I remember telling Josef stuff that I heard
8 them saying.

9 Q. And do you remember testifying at the grand jury
10 that you put his stuff in a place where she would never
11 find it, referring to Bambi?

12 A. I don't remember testifying that, but if -- you
13 know, it's true that I did remember putting his stuff up
14 when he would fall asleep.

15 Q. You do remember doing that?

16 A. I remember doing that. I don't remember
17 testifying it, but I remember doing it.

18 Q. In June of 2004 did you believe that Bambi Tyree
19 and Bolling and Leslie Williams all rolled over on Josef
20 Boehm to try to make it look like he was the one that
21 orchestrated everything and your stating that that was a
22 total lie?

23 A. That he orchestrated everything was a lie?

24 Q. Yes. That they made it look, they the other
25 three, Bolling, Williams, and Bambi Tyree, tried to make it

Page 82

1 look like Joe orchestrated everything, but that you
2 believed -- or you said that that was a total lie?

3 A. I may have believed that in 2004, yes.

4 Q. When you say you may have believed it, did you
5 believe that in 2004?

6 A. Yeah. I mean, I was still under, you know, the
7 thought that Josef was, yeah, a good man. But a good man
8 wouldn't do that to somebody 15 years old.

9 MR. JONES: Are you okay?

10 THE WITNESS: Yeah.

11 MR. JONES: Okay.

12 MR. KENNER: Actually, I have to use the
13 restroom shortly. I'm going to suggest we go for another
14 few minutes and then break for lunch and come back.

15 MR. JONES: Yeah, in fact, I appreciate if
16 we could continue, only because I want to make sure you get
17 all your time. What I didn't want to do is back us all
18 into a corner. I have 1:30 and 2:30 hearings tomorrow, and
19 they have been booked, of course, for months. I didn't
20 want us to run right up to the thing where I couldn't do a
21 cross and then you couldn't do a redirect. So if we could
22 push forward and that will give us the room if we need it
23 tomorrow to finish.

24 MR. KENNER: We're going to take an hour
25 lunch. I'm going to suggest we take it now, if that's

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1 okay.

2 MR. JONES: Absolutely. Do I look like I
3 want to miss a meal?

4 MR. KENNER: That was off the record.

5 VIDEOGRAPHER: We'll move off record at
6 11:40.

7 (Off the record.)

8 VIDEOGRAPHER: We're on record at 1:03 p.m.,
9 thank you.

10 MR. JONES: We've got one small matter if
11 you don't mind me addressing. I took the liberty while I
12 was at lunch trying to review some of the court stuff. And
13 it's real clear, unfortunately there has been no initial
14 disclosures on behalf of the defendant. We've tried to
15 give everything we have, everything in advance. And what
16 concerns me, more than concerns me, and I'm going to
17 reserve the right to file a motion regarding the
18 possibility of striking the depo, is that the defendants
19 are relying on investigations, there is mention of
20 investigations, tapes, grand jury proceedings, stuff that
21 should have been disclosed that to date has not been
22 disclosed, and the defendant is yet relying on these.

23 And in these civil proceedings there has to
24 be a willful and free exchange of documents and stuff that
25 you're relying on to question my client. We've got no

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1 forewarning of this, no disclosures. Even here in the
2 middle of the deposition even at this point I still don't
3 have a copy of the grand jury proceedings, I don't have a
4 copy of the tapes, a copy of the investigation, and who
5 knows what else is out there. So I'm reserving that right,
6 but I'm not going to terminate the deposition.

7 MR. KENNER: Okay.

8 BY MR. KENNER:

9 Q. Ms. Purser, with respect to your inability to
10 leave Mr. Boehm's house, you stayed for, at periods of
11 time, with Bambi Tyree in her trailer, is that correct?

12 A. Maybe for a day or two.

13 Q. Did you do that --

14 A. Never, like, long periods like I would at Josef
15 Boehm's house.

16 Q. But when you would do that you would leave Mr.
17 Boehm's house and you would go to Bambi Tyree's?

18 A. Yes, I would.

19 Q. And there were other times, like when you left in
20 his car that you just left the house, is that correct?

21 A. Yes.

22 Q. So when you wanted to leave the house you could
23 correct?

24 A. Yes.

25 Q. Now with respect to the sexual acts that you've

Page 85

1 described, and generally we talked about oral sex and maybe
2 some intercourse, were there any witnesses to any of these
3 acts, or were they always done in private with Mr. Boehm?

4 A. There was witnesses, yes.

5 Q. Who were the witnesses?

6 A. Bambi Tyree; Erin Axt; Regina, I don't know her
7 last name; Tina, and I don't know her last name; Leslie
8 Williams; Allen Bolling; Jamie, I don't know her last name,
9 she was one of the victims as well as I during the Josef
10 Boehm trial; Amber, I don't know her last name; as well as
11 some others.

12 Q. Were all of these people at the time these sex
13 acts would take place also under the influence of crack?

14 A. Not all, but most of them.

15 Q. Which ones were not?

16 A. Allen Bolling.

17 Q. Anybody else?

18 A. No, not that I know of.

19 Q. To your knowledge, everybody other than Allen
20 Bolling was under the influence of crack whenever these
21 events would take place?

22 A. Yes. Well, they have smoked crack. I'm not for
23 sure if they were high at the time, but I've seen every one

24 of those people, except for Allen Bolling and Leslie
25 Williams. Excuse me, Leslie Williams, too, was also not on

Page 86

1 drugs when he witnessed this.

2 Q. Let's talk about Allen Bolling. Did you have sex
3 with Allen Bolling?

4 A. Yes, I have.

5 Q. Were you raped by Mr. Bolling?

6 A. It wasn't consensual sex.

7 Q. Did he give you anything in return for that?

8 A. He got me high before he did it.

9 Q. Were you raped by any other people?

10 A. I consider rape, like, two different things. I
11 mean --

12 Q. Well, you've described that you were raped by Mr.
13 Bolling.

14 A. Yeah.

15 Q. Were you raped by anybody else in the same way
16 that you have in your mind when you say you were raped by
17 Mr. Bolling?

18 A. I feel I was raped by Josef, by Leslie, everybody.
19 I feel they took advantage of me. I wasn't screaming "no",
20 or "get off me", but I mean I was so high and incoherent
21 that I didn't know what I was doing, and if I was sober I
22 would not have done it.

23 Q. Now what was different with Mr. Bolling to make
24 you describe that as a rape?

25 A. Because he was aggressive. He was scary. More --

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1 he was just, I don't know, more scary to me.

2 Q. He forced --

3 A. He put more force than -- of everybody else that
4 I've had intercourse with.

5 Q. So with the other people, what was going on is
6 people were high on crack, and as a result of being high on
7 crack there were various sexual conduct that was taking
8 place?

9 MR. JONES: I'm going to object, that's
10 assuming facts in [sic] evidence. You've got a 60-year-old
11 man taking advantage of a 15 year old, not just because she
12 was high on crack but because he could. So you're making a
13 lot of assumptions that just a group of casual people got
14 together and did drugs and had sex, and that's not what's
15 occurring here. You're mischaracterizing what's occurring.

16 THE WITNESS: I was pressured into having
17 sex and giving oral sex.

18 BY MR. KENNER:

19 Q. When you were saying you were being pressured into
20 it, you were high on crack, is that correct?

21 A. Yes.

22 Q. Everybody else there was high on crack except Mr.
23 Bolling, is that correct?

24 A. And Leslie Williams didn't smoke crack that I know
25 of.

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1 Q. And when you were involved in these sexual acts,
2 other than the one forced by Mr. Bolling, they occurred
3 when everybody was high on crack, is that correct?

4 A. Yes.

5 Q. Is the reason that you believe that you did these
6 things was because you were high on crack?

7 A. Yeah.

8 Q. And you wanted to be high on crack at that time,
9 didn't you?

10 A. I wanted to get high, yes.

11 Q. You started using crack back with your mother,
12 correct?

13 A. Yes.

14 Q. And you used crack with a number of other people,
15 correct?

16 A. One other person.

17 Q. One other person. You developed a liking for it,
18 correct?

19 A. I had experimented with it.

20 Q. And you liked the experiments?

21 A. Yes.

22 Q. And then you found another source of cocaine -- of
23 getting crack, which was through Bambi Tyree, is that
24 correct?

25 A. Through Josef. Bambi didn't really give my drugs

Page 89

1 like Josef did.

2 Q. So Bambi brings you to Josef and you get drugs?

3 A. Yes.

4 Q. And that's what you wanted from him, is that
5 correct? That's why you went there, was to get drugs?

6 A. Yes.

7 Q. And for whatever period of times you would stay
8 there you would stay there so that you could continue to
9 get drugs?

10 A. Yes.

11 Q. Now you have answered a number of questions this
12 morning that I asked you by saying that, for example, about
13 Mr. Boehm being the victim of Ms. Tyree and Mr. Bolling and
14 Mr. Williams, by saying that's what you believed when you
15 said those things in 2004. But am I correct in assuming
16 that you're saying you don't no longer feel that way?

17 A. No, I do not any longer feel that way.

18 Q. Between that time and now you have filed a civil
19 complaint, is that correct?

20 A. Yes, that is correct.

21 Q. And that civil complaint is for damages for money,
22 is that right?

23 A. Yes.

24 Q. Is the fact that you have filed a lawsuit for
25 money making various allegations that are different than

Page 90

1 what you felt in 2004, the reason that you changed your
2 feeling?

3 A. The reason I filed the civil suit is because my
4 feelings changed.

5 Q. And your feelings changed because of what?

6 A. Because I've been sober for over two years now,
7 and I'm realizing that what Josef did to me was wrong.

8 I was 15 years old when I met him, okay.

9 When you start doing drugs, your brain stops growing. You
10 know, I did start using marijuana at 13, 14, so I had the
11 mentality of a very young child. This is a 60-year-old
12 man. He knew what he was doing regardless of the fact that
13 he was high or not.

14 Me being a child and getting high and doing
15 what I did, and not being very aware of my sexuality at 15
16 years old and doing this, because that was what he wanted,
17 and I enjoyed getting high, you know, I mean, that's not
18 right. And that's why I'm here filing a civil suit,
19 because I still suffer from it today. I have dreams about
20 smoking crack. I wake up holding my breath. And I
21 don't -- you know, it's difficult.

22 Q. The question to you is, what is it that -- I
23 understand that you have different feelings about smoking
24 crack now than you had when you were smoking it.

25 My question is, what has changed your

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1 opinion that Mr. Boehm, regardless of the fact that he was
2 smoking crack and that you were, and that you feel what
3 happened was not right, what made you change your feelings
4 that he was being victimized by the other people with
5 respect to stealing from him, getting him high, keeping him
6 high, taking things from him?

7 MR. JONES: I'm going to object. That's his
8 position. There is no facts in evidence. In fact, all the
9 facts to the contrary in the criminal matter. I'm going to
10 object that's been asked and answered. But she can answer,
11 again, if it helps clarify maybe if something was missed.

12 MR. KENNER: That's what she said earlier.

13 MR. JONES: She said that she had been sober
14 for two years and she realized what he's done to her. But
15 if there was something additional, you should answer.

16 THE WITNESS: I would like to. In 2002 back
17 when I did grand jury and I had this interview with this
18 investigator right here on your side, I was still under the
19 influence of drugs. I may not have been using cocaine at
20 the moment, but yet still all those things still applied,
21 the thoughts in my head from them when I was high, the fact
22 that, you know, I still wanted to get high.

23 Josef abused me, sexually abused me, and I
24 defended him because I still cared about him two years ago
25 when I did grand jury -- that was three years ago when I

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1 did grand jury and the investigation.

2 BY MR. KENNER:

3 Q. How long was it -- sorry, I didn't mean to
4 interrupt you.

5 A. That's okay.

6 Q. How long was it that you had not used drugs until
7 you testified at the grand jury, how much time elapsed?

8 A. Well, let's see. I was using drugs in Seattle,
9 and the whole reason they even got me up here is because
10 ended up in juvenile detention when I got arrested in
11 Seattle. And they flew me up from juvenile detention up
12 there to the one up here and I testified. I'd maybe been
13 sober two weeks, if that.

14 Because I spent a lot of time -- I spent a
15 month total -- I think it was a month and ten days total in
16 jail, and I spent more time in jail afterward than I did
17 before when I did the grand jury. So I'm guessing between
18 one and two weeks.

19 Q. And this was in 2002?

20 A. Yes.

21 Q. So you stopped using cocaine in 2002 and you went
22 to the grand jury in 2002?

23 A. The grand jury was in 2002? I don't know exactly
24 when the grand jury was, but if that's when it was, that's
25 when it happened. Whenever the grand jury was is when I

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1 was -- I was, like, not using crack cocaine while I was in
2 the room talking to all the people and Frank Russo, but two
3 weeks prior to that I was using.

4 Q. Two weeks prior to that you were using crack
5 cocaine in Seattle?

6 A. Yes, yes.

7 Q. So you were still using crack cocaine in 2004?

8 A. Yes. Wait, in 2004? Yeah, when I got arrested
9 for possession I was using crack cocaine.

10 Q. Was that after the grand jury?

11 A. 2004 was after -- yeah, that was after the grand
12 jury. You don't know when the grand jury is, was? I don't
13 know the exact --

14 MR. JONES: You don't get to ask him
15 questions.

16 THE WITNESS: I don't know the exact date of
17 the grand jury. So whenever I testified for the grand jury
18 is the date that I'm talking about right now.

19 BY MR. KENNER:

20 Q. And did you have a conversation with the U.S.
21 attorney who took your testimony about the fact that you
22 had just stopped using drugs two weeks earlier and did not
23 have a very clear recollection of your thoughts and
24 feelings?

25 A. I don't recall that. I don't recall having that

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1 conversation.

2 Q. Did you have that conversation with anybody?

3 A. Steve Boltz knew I was using.

4 Q. Did you tell Mr. Boltz that you were not in a
5 position to testify because you were still getting clean?

6 MR. JONES: Again, I'm going to have to
7 object to that. There has been no determination of facts
8 in evidence indicating whether or not she was competent to
9 testify to a grand jury as to about what occurred to her.
10 She said she was still under the influence of the desires
11 of cocaine, and doesn't mean she can't competently testify.

12 MR. KENNER: You're objecting to the form of
13 the question?

14 MR. JONES: Can you read back what my
15 objection initially was, or did I voice my objection?

16 MR. GREENFIELD: Objections in depositions
17 are meant to be to the form of the question.

18 MR. JONES: No, they are not, I just
19 researched that issue. There is 12, 12 objections you can
20 do. But if you don't insert in five or six of them then
21 you waive them, and I'm not waiving any of them. You're
22 assuming facts in [sic] evidence, and that is something you
23 can bring up at a deposition as an objection.

24 MR. KENNER: What is the objection that --
25 what is it --

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1 MR. JONES: I'm objecting because you're
2 assuming facts in [sic] evidence, that she was incompetent.
3 You're basically testifying that she was incompetent to
4 testify before the grand jury. And I guess the form of the
5 question would be appropriate, that's correct, I'm sorry.

6 MR. KENNER: And just so the record is
7 clear, as I've understood the testimony, she's telling us
8 or has been telling us the things that she said at the
9 grand jury she now believes were not true or accurate
10 because she was not clear headed.

11 MR. JONES: With respect to how she felt
12 about Mr. Boehm and him manipulating her, that's exactly
13 true. But as to the actual facts and events that occurred,
14 not her feelings, she has not indicated that she has not
15 testified accurately at the grand jury with regards to
16 those. Only with regards to her feelings regarding Mr.
17 Boehm being manipulated by other people or how she feels
18 about him or how he might have felt about her.

19 BY MR. KENNER:

20 Q. So your testimony then is that everything you said
21 at the grand jury you were lucid and clear about in your
22 own mind except for how you felt about Mr. Boehm, is that a
23 fair statement?

24 A. I feel --

25 Q. Is that a fair statement?

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1 A. Can you clarify that?

2 Q. Yes. As I understand what your attorney just
3 said, was that -- let me put it in the form of a question.

4 Is it true that everything you testified to
5 at the grand jury, except for your feelings about Mr. Boehm
6 and his role in what was taking place with respect to
7 Tyree, Williams, and Bolling, everything else you were
8 lucid and clear about, notwithstanding the fact that you
9 had just stopped using cocaine? The only thing you were
10 not lucid and clear about was your feelings about Mr. Boehm
11 at the time you testified, is that a fair statement?

12 A. Yes.

13 Q. Okay. So is it your testimony then that when
14 you're under the influence of crack cocaine to the point
15 where I think you described it as being stuck --

16 A. Uh-huh.

17 Q. -- that there is no -- that there is no impact on
18 your ability to recall facts and events while you're that
19 high?

20 A. I can recall facts and events. I mean, obviously.
21 I mean, not all of them. It depends on how long you're
22 awake. Say if I was awake for eight days, I'm not going to
23 be able to remember what happened right before I fell
24 asleep.

25 Q. So would it be a fair statement to say then that

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1 some of the things that you recall at the time of the grand
2 jury, and even today, are things that you recall because,
3 even though you were high on crack, you weren't so high
4 that your ability to recall was affected, and other things
5 what you recall now and at the time of the grand jury may
6 have been affected by your use?

7 A. What I'm saying is some things I remember and some
8 things I don't. And I stated, you know, certain things at
9 grand jury that I still stand by today, and that some
10 things that I would have worded differently if I could do
11 it again today.

12 Q. As I understood your previous question [sic], the
13 only things that you would have said different would have
14 to do with how you felt about Mr. Boehm with respect to his
15 role with Williams, Bolling, and Tyree?

16 A. Those might not be the only ones, but those would
17 definitely be things I would change.

18 Q. So there might be other things in your grand jury
19 testimony that are inaccurate because of your inability to
20 recall because you were still under the influence or just
21 coming out from being under the influence?

22 A. I wouldn't say they would be inaccurate. I would
23 say that I might state things differently. Like the fact
24 that Allen brought an ounce every day. I don't know if he
25 brought exactly an ounce. And today I don't know what an

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1 ounce is. I don't measure things in ounces. I don't look
2 at things in ounces. I know a shampoo bottle is like eight
3 ounces, but I don't look at it and think, oh, 1/8th of that
4 is how much an ounce of crack cocaine is, I don't think of
5 that. So there are some things that I would probably state
6 differently.

7 I'm not saying that I lied in grand
8 testimony, whatever, grand jury, I'm not saying there is
9 false statements. I'm say saying that I feel different
10 about Josef today than I did back then.

11 Q. Just so I'm clear, my questions don't have to do
12 with your going to the grand jury to lying. My questions
13 have to do with your state of mind at the grand jury given
14 the fact that you told us that you were having a problem
15 remembering how you felt about some things because of the
16 fact that you were just coming off of being on cocaine.
17 That's not to say --

18 A. I was just coming off of being sexually abused by
19 Josef Boehm. I was protecting him halfway. Because that's
20 what people do when they are sexually abused by somebody,
21 they protect the person that abuses them.

22 Q. Who told you that?

23 A. A psychologist I used to see.

24 Q. What psychologist told you that?

25 A. Ann Stockman told me.

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1 Q. Excuse me, a psychologist named Ann Stockman.
2 She's from Alaska here?

3 A. Yeah.

4 Q. And she told you that people that had been abused
5 protect the people that have abused them?

6 A. Yeah. That's not only with sexual abuse. Any
7 kind of abuse, mental abuse, sexual abuse, physical abuse.

8 Q. Now when you were at Mr. Boehm's house, there were
9 constantly other people around, weren't there?

10 A. A lot.

11 Q. You just gave us a whole list of people. They
12 were coming and going all the time?

13 A. There was a lot of people in and out of his house.

14 Q. And those people had the ability to come in and
15 out at will? Nobody locked them in or kept them from
16 leaving?

17 A. Yes.

18 Q. And you had the same ability to come and go at
19 will?

20 A. Yeah, sure.

21 Q. Now were people stealing things from Mr. Boehm all
22 of the time during the time period that you were -- however
23 you feel about him, whether he was a good person or a bad
24 person, you did it -- is it true that you observed people
25 stealing things from Mr. Boehm, taking advantage of his

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1 being high?

2 A. I have seen people steal from Josef, yes.

3 Q. Have you seen people -- have you heard
4 conversations -- withdraw that.

5 Were you aware that people were getting Mr.
6 Boehm high, not only with drugs but by adding other things
7 to his food or his drugs, so that he would pass out so that
8 they could steal from him?

9 A. No, I was not aware of that.

10 Q. Have you ever said that to anybody before?

11 A. I might have said something about drug lacing or
12 getting drugs. Because when I was using and coming off I
13 felt that I was going through the same thing. I had a
14 problem eating food that other people would prepare for me
15 for a year-and-a-half because of what happened and how
16 spooked everybody was about getting drugged.

17 Q. My question to you, and I'm trying -- I'm not
18 arguing with you, I understand what you're saying.

19 My question to you is, whether you felt it
20 was happening to you or not, did you believe or did you see
21 things which made you believe that that was happening to
22 Mr. Boehm?

23 A. I did not believe or see it. But that's not what
24 you asked me, you asked me if I said it. And I might have
25 and that's why I said it, might have said it.

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1 Q. You might have said it because --

2 A. I felt the same way.

3 Q. So because you felt that way you might have said
4 that Mr. Boehm was being taken advantage of that way?

5 A. Maybe, yes. You know, I remember something
6 about -- I remember something about hearing about that. I
7 might have resaid it to somebody else, an investigator or
8 grand jury. I don't recall stating that I know for a fact
9 he got drugged, because I don't know for a fact that he got
10 drugged.

11 Q. What things do you know that were stolen from him?

12 A. Money and drugs for definitely. His car was
13 taken.

14 Q. Did you ever take his car?

15 A. I did. He gave me permission always, though.

16 Q. So not only were you free to leave when you wanted
17 to leave, but he gave you permission to use his car during
18 some of the times that you wanted to leave?

19 A. There was times I could leave and there was times
20 he would rather me not leave. It was more of a paranoia
21 thing and keeping me held there because people were out to
22 get me. Somebody was going to hurt me. It's not safe out
23 there. And that's why I felt that I was held captive, that
24 I couldn't leave, because he would feed me things in my
25 head that would make me spooked, get stuck, and not want to

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1 leave. I was scared to leave his house.
 2 Q. But you would leave his house and you would go
 3 with Bambi --
 4 A. Occasionally.
 5 Q. And you would go in his car?
 6 A. I would go with Josef and Bambi. I never left
 7 with Bambi, she was always in trouble. I never left with
 8 her by herself unless I knew where she was going.
 9 Q. Were you with Mr. Bolling at times when Mr. Boehm
 10 wasn't around?
 11 A. Very few.
 12 Q. Did you ever go anyplace with Mr. Bolling outside
 13 Mr. Boehm's house?
 14 A. I never left Josef's house with Allen.
 15 Q. Were you ever with Mr. Bolling in Mr. Boehm's
 16 house when Mr. Boehm was not there?
 17 A. Not that I recall.
 18 Q. You were at his house a number of occasions when
 19 he wasn't there?
 20 A. Yes.
 21 Q. Quite a few occasions, correct?
 22 A. He was mostly always home. I don't remember being
 23 at his house a lot when he wasn't there.
 24 Q. Do you remember him trying to get people to leave
 25 his house?

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1 A. Yes, I do.
 2 Q. And that's because he was afraid they were going
 3 to do something to him?
 4 A. Yeah, or they would be using all his drugs and he
 5 would get mad.
 6 Q. And he would do whatever he could to try to get
 7 them to leave, usually without success?
 8 A. No, he wouldn't do whatever he could. I mean, he
 9 would ask them to leave, and never really enforced it. He
 10 would just go in his room and lock the door.
 11 Q. He had a dead bolt on the door?
 12 A. The bedroom door?
 13 Q. Yes.
 14 A. Yes.
 15 Q. So he would try to get people leave, and when he
 16 couldn't he would go in his bedroom and close the bolt?
 17 A. Uh-huh.
 18 Q. And you said something earlier about going into
 19 the house through an open window or broken window?
 20 A. Yeah, there was a window in the tanning room.
 21 Q. Why would you go into the house through that
 22 window?
 23 A. You know, I don't know. I was on drugs. I was
 24 high. Nobody answered the door, and I figured, you know,
 25 it was obviously for a reason. But, I mean, everybody came

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1 in the window, all the girls did.
 2 Q. So Mr. Boehm not only didn't have the ability to
 3 get people to leave, but there was a broken window that
 4 people at will would come and go from?
 5 A. Yes.
 6 Q. Do you remember a Tina and Regina that you
 7 mentioned almost always being there?
 8 A. They weren't always there. They were --
 9 Q. Almost always there. Most of the time.
 10 A. I would say maybe half the time, if even that
 11 much.
 12 Q. Do you live with -- I think you told us you live
 13 with your boyfriend now?
 14 A. Uh-huh.
 15 Q. And do you see your mother?
 16 A. I have seen my mother. I went and visited her
 17 recently.
 18 Q. How often do you see your mother?
 19 A. Not very often. She doesn't live in Alaska.
 20 Q. Where does she live?
 21 A. Seattle -- or Bellevue, Washington.
 22 Q. Is she still using crack?
 23 A. No, she's not.
 24 MR. JONES: Can we go off the record for a
 25 second while they are taking a break.

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1 VIDEOGRAPHER: Off record, 1:32.
 2 (Off the record.)
 3 VIDEOGRAPHER: Give me just a moment,
 4 counsel, if you will. We're on record at 1:33.
 5 BY MR. KENNER:
 6 Q. Do you remember an occasion when Leslie Williams
 7 brought some food over that had already been opened that
 8 you tasted and you thought that it had been sprayed with
 9 something, and your response to it was, "I don't know what
 10 the fuck it was sprayed with, but I'm going to puke"?
 11 A. I remember saying that.
 12 Q. Was that true when you said it?
 13 A. At the time, you know, with the mind frame I had,
 14 that's how I felt. But, I mean, I just -- I wouldn't eat,
 15 period. I don't remember -- I remember saying that. I
 16 don't remember to this day what kind of food it was or what
 17 I ate. I'm thinking it was a salad. I don't know.
 18 Q. But you did say that?
 19 A. Yeah, I did say that.
 20 Q. And you did believe at that time that there was
 21 something that was --
 22 A. At that time I believed that, yes.
 23 Q. -- they were trying to harm Mr. Boehm?
 24 A. Yes, at that time I believed that.
 25 Q. And now you don't believe that?

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1 A. No, I just didn't want to eat when I was smoking
2 crack.

3 Q. No, I'm asking whether you no longer believe that?

4 A. Yeah, I don't -- you know, I remember saying that.
5 I don't remember the food. I don't remember what it tasted
6 like. And I don't remember if I ate it or not. And I
7 don't remember if I passed out. So I can't say that I
8 still think that, okay. I don't know, I can't remember,
9 I'm sorry.

10 Q. So is it your position that people may or may not
11 have been trying to, with food or in other ways, make Mr.
12 Boehm unconscious so that they could do whatever they
13 wanted to do, you just don't remember one way or the other?

14 A. I have no position to say that. In my opinion,
15 what I think is as soon as you eat something you are ready
16 to go to sleep because you've been up so long and smoking
17 crack, and that's why he would go to sleep, and I would go
18 to sleep after I ate something.

19 Q. Did you feel comfortable around Mr. Bolling and
20 not -- I'm sorry, around Mr. Boehm and not threatened by
21 him, only feeling threatened by Tyree, Bolling, and
22 Williams?

23 A. There was an uneasiness around all of them. I
24 think I was most comfortable with Josef and Bambi, only
25 because they were the ones that gave me most of the drugs

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1 and that's what I was happy and comfortable with at the
2 time.

3 Q. And did you feel that things that you did with
4 Josef Boehm were consensual?

5 A. Due to the fact that I was on drugs, yeah. If I
6 wouldn't have been on drugs, I definitely would have never
7 done that.

8 Q. You know who Mr. Burnett is?

9 A. Yes, I do.

10 Q. Who is he?

11 A. Bruce Burnett.

12 Q. Do you ever remember being made aware of a tape
13 recording that was found in Mr. Burnett's car about you?

14 A. I've never heard about that.

15 Q. Did you ever hear about a tape recording of which
16 your mother said that she would have signed over custody to
17 Mr. Burnett of you in exchange for the crack cocaine?

18 A. I would really like to hear that. I don't believe
19 that.

20 Q. Okay, so you have no knowledge of that?

21 A. I have no knowledge of that.

22 MR. KENNER: Counsel, may I ask, will you
23 provide us -- I don't want to ask on the record. Will you
24 provide us with the address and location of Kathleen Purser
25 on the condition that it not be given to --

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1 THE WITNESS: I don't think she would like
2 you to have that, I really don't think she would.

3 MR. JONES: If she'll give it to him.

4 THE WITNESS: You're going to ask my mom?

5 MR. JONES: I know your mother, and your
6 mother is not going to give it to me, I know that, she
7 won't. I'll ask, but I can almost guarantee that she won't
8 give it to me. But you'll give me her number so I can talk
9 to her?

10 THE WITNESS: Yeah. Do you want it now?

11 MR. JONES: No.

12 BY MR. KENNER:

13 Q. Did you -- I want to go back to this tape
14 recording about Burnett that you say you would like to
15 hear. You don't believe that that ever happened?

16 A. I would really like to hear it.

17 MR. JONES: And I'm going to kind of object
18 to the relevance. I'm not sure how her mother --

19 MR. GREENFIELD: Goes to damages. It's
20 relevant.

21 MR. JONES: All right then, for the moment.

22 THE WITNESS: How do you guys even know it's
23 really my mom? Sorry, I can't ask questions, I apologize.

24 BY MR. KENNER:

25 Q. Do you remember making a statement or giving an

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1 answer at the grand jury hearing as follows: But my mom
2 had a recorded conversation with Bruce Burnett about --
3 about something that was going on. I didn't get to hear
4 the whole -- I've heard the tape myself. When I -- when
5 Bruce -- Bruce drove me around to get a couple of things
6 done, like get my ID, he fed me, he took me to get a birth
7 certificate. And when Tina -- he took me shopping, too.

8 He gave -- he gave me and Tina money to go shopping. When
9 he left us in his truck, I think he obviously left his tape

10 recorder out, but Tina started playing it, and once I heard
11 my mom's voice, I zeroed in on the tape, so I know that --

12 I never told you that, either. Bruce -- Bruce Burnett and
13 my mom had something going on. I don't know exactly what

14 it was, but my mom was letting him know everything that was
15 illegal, that -- that if she gets a certain amount of

16 money, or a certain something, I don't remember what it
17 was, that she'll sign all custody of me over to Bruce.

18 Do you remember testifying to that in front
19 of the grand jury?

20 A. I don't remember testifying to that, but I do
21 remember being in Bruce Burnett's car, Tina going through
22 stuff and finding a tape recorder. I don't remember --

23 right now I don't remember anything about my mom signing
24 custody or any of that. But I do remember about hearing

25 Tina talk about it and what was on the videotape. I never

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1 heard my mom say anything about signing custody over to
2 Bruce Burnett.

3 Q. Did you testify in front of the grand jury that
4 you heard that?

5 A. Well, I mean, if you would let me review that and
6 see. Obviously I did.

7 MR. JONES: While she's reviewing that, I'm
8 going to inquire as to why you're again relying on a tape,
9 a piece of evidence that you clearly intend to present at a
10 civil trial that you have not disclosed. I'm going to
11 object to its disclosure and the use or any reference to it
12 in any way, shape or form.

13 MR. KENNER: Counsel, I don't know why
14 you're jumping to the conclusion that I have a tape. What
15 I have is testimony about the tape given by your client
16 under oath at the grand jury, and that's what I'm about to
17 show her.

18 MR. JONES: Of course, once again, I'll
19 probably object to that because we still have not been
20 provided a copy of the transcript.

21 MR. KENNER: I understand your position
22 about the transcripts and we've talked about that. I don't
23 want you jumping to the conclusion that there is a tape
24 that I have.

25 MR. JONES: That's what I'm saying. If at

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1 some point it pops up, then I'm going to object to it.

2 MR. KENNER: If at some point it pops up I'd
3 love to listen to it.

4 THE WITNESS: Yeah, me too.

5 BY MR. KENNER:

6 Q. Would you read -- I'm going to show you page 62,
7 and I've made a red line above line 4 and at the bottom of
8 line 22, and I'm going to ask you to read that testimony
9 and tell me whether or not that refreshes your recollection
10 about having testified to that?

11 MR. JONES: I'm going to step outside for
12 just a minute. We don't need to go off the record.

13 THE WITNESS: Am I allowed to answer that?

14 MR. JONES: Just let Mr. Kenner know.

15 BY MR. KENNER:

16 Q. Does that refresh your recollection now about
17 having said that?

18 A. Yes. Okay, and I'm reading it, and it looks like
19 I stumble over my words a lot. So this is the grand jury,
20 though?

21 Q. Yes.

22 A. And at the end -- in the beginning I wrote: "I
23 didn't get to hear the whole thing... I don't -- about
24 something that's going on, I didn't get to hear the whole
25 thing but I did hear my mom's voice. And then I don't know

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1 exactly what it was, comma..." and then from what it sounds
2 like after this I'm going off hearsay that I already
3 gained, because I remember Tina trying to feed me some --
4 and that was another reason I didn't want to leave Josef's
5 house.

6 Q. The questions is, does this refresh your
7 recollection that you did say that?

8 A. Yes. Am I not allowed to explain?

9 Q. And now that you're saying that you remember
10 saying it, you're telling us that the last part of that
11 statement you now believe to be hearsay?

12 A. To be -- I'm not telling you from facts that I
13 heard this from my mother. I'm telling you from what other
14 people had told me. That's what the bottom -- that's what
15 it looks like to me. Because I never once heard my mom
16 say, "I will give my daughter up for custody." I don't
17 remember -- I think I would remember something about that.

18 I remember something about a tape, and I
19 remember Tina telling me, just like Josef would tell me
20 people were out to get me, Tina telling me that my mom
21 wanted give me up.

22 Q. Now did Mr. Boehm give anything to your mother in
23 return for her letting you hang out with him?

24 A. Not to my knowledge. I mean, I've heard so many
25 different things, but I've never once seen Josef say, "Here

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1 is this, leave us alone".

2 Q. Do you remember being asked the following
3 questions and giving the following answers.

4 Question: Do you know if your mom got any
5 cocaine or money for letting you kind of hang out with Joe?

6 Answer: That's what -- that's the whole
7 reason my mom kept quiet for so long is because Joe would
8 feed her dope and give her money when she, you know, she --

9 Question: Because your mom would call the
10 police occasionally?

11 Answer: Uh-huh, when she didn't get her
12 way. That's why Joe kept on giving her money and dope for
13 me to be over there and have her be happy.

14 Do you recall being asked --

15 A. I remember saying that.

16 Q. Was it true at the time you said it?

17 A. It was true at the time I said it.

18 Q. Is it true today?

19 A. I feel different about it, but I mean --

20 Q. When you say you feel different, I'm not asking
21 what your emotional response to those facts are. Are those
22 facts still true today, the facts you testified to then?

23 A. I don't know how to answer that. Because the only
24 person that really told me, you know, I mean -- my mom
25 never once told me she accepted things for me. Josef and

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1 Bambi and Tina were all telling me that. And I don't even
2 know how to answer that question.

3 All I know is Josef was obviously doing
4 something illegal and he knew about it and he had to give
5 my mom -- if he had to give my mom drugs and money to keep
6 quiet, I mean, that's stupid. He shouldn't have been doing
7 it to begin with.

8 Q. That's not my question.

9 A. I don't know how to answer your question, sir.

10 Q. So you don't know if that happened or not, today
11 as you reflect back on it?

12 A. I don't know if that happened, today. I know
13 that's how I felt back in 2002.

14 Q. Do you recall at an interview four months after
15 that grand jury testimony saying that the reason that your
16 mother went to the police was because Josef Boehm wouldn't
17 give her any more money?

18 MR. JONES: I'm going to object, it's vague.
19 What interview? By who?

20 MR. KENNER: Interview on June 4th, 2004.

21 MR. JONES: By the investigator.

22 MR. KENNER: By the investigator.

23 BY MR. KENNER:

24 Q. Do you remember saying that?

25 A. I remember saying that.

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1 Q. Was it true then?

2 A. It was true back then, yes.

3 Q. Is it true today?

4 A. It could still -- yeah, it's true today. I have
5 different feelings about it, though. I don't know -- like,
6 it can't change.

7 Q. Ms. Purser, let me make a distinction for you. I
8 understand that you're explaining to us that the way you
9 feel about things that happened in the past is different
10 now than the way you felt about them previously.

11 I'm trying to get at what the facts were,
12 not how you felt about the facts. Do you understand that
13 difference?

14 MR. JONES: But you've also got to
15 understand her perception of the facts and stuff due to the
16 nature of the drugs and stuff differs, too. So while we
17 talk about feelings, facts, emotions, you're dealing with
18 something way and above her intellectual capacity because
19 you know it's perception as well as anything.

20 MR. KENNER: And I'm trying to find out if
21 she has a memory of these facts having occurred now, at
22 that time.

23 MR. JONES: And I appreciate that. I just
24 want -- I've been listening close. I'm wondering if this
25 is going more to the issue of damages, since liability is

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1 pretty clear cut, but the issue of damages or of an appeal
2 on Mr. Boehm's part. It's almost as if you're trying to
3 rehash the criminal aspect of things in an attempt to
4 undermine the grand jury.

5 I don't want to object, because I'm trying
6 to get a feel for where this is going. But so far it's
7 more of -- okay, you know, so -- well, let's let it go on
8 and see what happens. I don't see the link in the damages
9 yet, unless you're trying to undermine credibility of a
10 crack addict 15 year old at the time. That's fine if you
11 think that can happen, since a 15-year-old crack addict has
12 no credibility.

13 MR. KENNER: I'll stipulate to that. Do you
14 want to enter a stipulation that a 15-year-old crack addict
15 doesn't have credibility?

16 MR. JONES: I think you're missing the
17 point. What I'm saying is that a 15 year old that's been
18 addicted to crack cocaine by a 60-year-old man cannot be
19 expected to be totally coherent during the period of time
20 she's addicted to crack cocaine, so everything is in
21 question, everything is in question.

22 The question is did the grand jury -- did
23 the grand jury feel her testimony, along with other
24 people's, was credible enough to indict him, and they did.
25 Now everything that's been done -- and he's admitted to

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1 these behavior patterns by way of his plea agreement. Now
2 it's a question really of damages.

3 So, I mean, if I could get a feel for where
4 you're going on how you think questioning her about what
5 she might have said at a grand jury goes to the damages of
6 what this 60-year-old man did to this 15-year-old child, if
7 you're going to come back and say, listen, geez, it's her,
8 other people took advantage of Mr. Boehm and this 15 year
9 old wanted crack so she took advantage. You can do that,
10 guess. I don't think it will fly. But if that's what
11 you're questioning her about her credibility, then we can
12 go on.

13 MR. KENNER: Mr. Jones, you've been very
14 polite, and we'll try to do the same. I do believe that it
15 is an important part of this case, irrespective of whether
16 the grand jury -- there is an old phrase in criminal law
17 the grand jury will indict a ham sandwich.

18 I'm not doing this because of what the grand
19 jury believed or didn't believe. I'm doing this because
20 there are facts that were testified to. Now we are talking
21 about those facts being in dispute, or at least a number of
22 those facts being in dispute. They may be in dispute
23 because, as you say, a 15-year-old crack addict --

24 MR. JONES: I'm trying to figure out the
25 damages issue.

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1 MR. KENNER: Well, it's not just damages.
2 If the facts are in dispute, then the facts are in dispute,
3 that goes to liability as well as to damages. So it's not
4 just a question of the facts being in dispute.

5 MR. JONES: Do you think there is any way a
6 60 year old having sex with a 15 year old is going to get
7 around the liability issue, you've got a problem right off
8 the bat.

9 MR. KENNER: I don't know what a jury is
10 going to do any more than you know what a jury is going to
11 do. But I do know if the facts are different as a result
12 of this deposition than they have been reported to be
13 previously, then there are factual issues that have to be
14 resolved.

15 MR. JONES: That's interesting. Okay, I
16 understand where you're going now, now it makes sense.

17 MR. KENNER: I'm not telling you that I know
18 more than you do. I'm simply saying --

19 MR. JONES: Okay.

20 BY MR. KENNER:

21 Q. When you indicated that you had sex with Mr.
22 Bolling, did Mr. Bolling -- did you, as a result of that,
23 end up with a sexually transmitted disease that Mr. Bolling
24 had?

25 A. Not that I recall. I know that I did have trich

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1 when I moved to Seattle, so I don't know who I got it from.
2 I was having sex with both Josef Boehm, I had sex with
3 Allen Bolling, I also had sex with Leslie Williams.

4 Q. And Jay Whaley?

5 A. Not at the time before I moved to Seattle.

6 Q. Do you recall being asked the following questions
7 and giving the following answers in an interview with Mr.
8 Shurtleff on June 4th, 2004 with respect to Mr. Bolling and
9 sexually transmitted diseases.

10 Starting with your answer: Well, I don't
11 know why I should -- who I should and shouldn't be talking
12 to. I just wanted to get out of jail. I don't care about
13 Josef. I don't care about none of them mother fuckers,
14 especially Al.

15 Question: Uh-huh.

16 Answer: For all I care, Al can eat shit for
17 the rest of his life, okay.

18 Question: Well, I'm not inclined to
19 disagree with you on that, but --

20 Answer: Al --

21 Question: -- can --

22 Answer: -- too.

23 Question: I don't know, I don't know.

24 Answer: Dirty ass mother fucker.

25 Question: I don't know if he will or not.

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1 Would you mind talking to me about it?

2 What about Al, he had AIDS. That's your
3 answer.

4 Question: Well --

5 Answer: And he's spreading his disease.

6 Question: He has AIDS and he's spreading
7 his disease. Okay, so tell me more about that.

8 Answer: Tell you about that, what? That
9 he's a dirty mother fucker and he gives little girls trich
10 like myself.

11 Is that what he did?

12 He gave me a sexually transmitted disease
13 called trichomonosis.

14 Do you remember testifying to that?

15 A. That was in interview, that was not testimony.

16 Q. In an interview. Do you remember giving those
17 answers in that interview?

18 A. Yeah. I don't know if Allen has AIDS. I was
19 probably talking shit. And you can tell by my language and
20 the attitude I used that I wasn't happy with any of that.

21 Q. But you did say there that he's the one that gave
22 you this disease?

23 A. I don't know for a fact, but I did say that.

24 Q. Did you become pregnant as a result of having sex
25 with Mr. Bolling?

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1 A. No.

2 MR. KENNER: Just a moment, please.

3 BY MR. KENNER:

4 Q. Do you know who Jamie Millhouse is?

5 A. I've heard his name.

6 Q. Did you ever make an allegation that he sexually
7 assaulted you?

8 A. No.

9 Q. Did you go to school with him?

10 A. He's like 15 years older than I am. So no, I
11 didn't.

12 Q. Now did there come a time when your mother lost
13 her house because she couldn't make the mortgage payments?

14 A. Yes.

15 Q. And after that time did she call Mr. Boehm to try
16 to get some money to help her move to Seattle?

17 A. Josef offered.

18 Q. Josef offered to help her move to Seattle?

19 A. Us.

20 Q. To help you guys move to Seattle?

21 A. Yes.

22 Q. Did -- how much money did he give you, do you
23 know?

24 A. He didn't give me any money. He sent me with
25 Leslie Williams, who he gave Leslie all the money to, and

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1 he gave my mom some odd grand.

2 Q. 2500?

3 A. I think it was like 3 or 4 grand. It might have
4 been more, I don't know.

5 Q. Then how long did you and your mother stay in
6 Seattle?

7 A. She's been there ever since. I came back in May
8 2004.

9 Q. After you got arrested?

10 A. No, before I got arrested, and that's why I got
11 arrested. I came back to -- well, I came back for grand
12 jury, and we've already talked about that. But the time I
13 came back and stayed was in May 2004, and I've been here
14 since. It may even have been April, because May was when I
15 got arrested.

16 Q. By the way, is there a different Jamie Millhouse
17 than the one you're referring to that you did go to school
18 with?

19 A. His name is Clay Millhouse that I went to school
20 with.

21 Q. I'm sorry. Did you ever make a sexual assault
22 claim against him?

23 A. Nope.

24 Q. Did you ever make any claim about him assaulting
25 you?

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1 A. Not Clay Millhouse.

2 Q. Not what?

3 A. No, not Clay Millhouse.

4 Q. Anybody at that school? Did you make a claim
5 about them sexually assaulting you?

6 A. At my school?

7 Q. Yes.

8 A. No.

9 Q. Did you ever make any sexual assault claims
10 against anybody, other than in this case?

11 A. The assault claim never went through. There was
12 never an assault claim filed.

13 Q. Was there a sexual assault that you were going to
14 file a claim about?

15 A. My mom wanted to file a claim about a sexual
16 assault.

17 Q. Against who?

18 A. Blake Millhouse.

19 Q. Why did she want to do that, if you know?

20 A. Because I was hanging out at Clay Millhouse's
21 house and his older brother lied to me about his age. And
22 we kissed and made out and touched each other.

23 Q. Did you ever tell Detective Boltz that you were
24 pregnant with Mr. Bolling's child?

25 A. I thought I was pregnant.

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1 Q. With Mr. Bolling's child?

2 A. I wouldn't know whose child it would have been.

3 Q. Did you say that to Detective Boltz?

4 A. No. My mom might have, but I don't ever remember
5 saying that I'm pregnant with Allen's kid. I remember
6 having the fear of pregnancy when I moved down there, but
7 it wasn't pregnancy, it was the fact that I was so
8 underweight I didn't have my period, and it took me three
9 months to get it back.

10 Q. So if Detective Boltz wrote in his report that
11 Salley Purser said she was pregnant with Bolling's child,
12 that would be an incorrect statement he was making?

13 A. No. I don't recall telling him that. I might
14 have. You have to remember, I was on drugs for, like, a
15 year-and-a-half, I moved to Seattle, I tried to clean up.
16 Even after I sober up, I don't remember exactly what's
17 going on. To this day I can't tell you. I really can't
18 tell you if I said that or not.

19 MR. JONES: I'm going to object to the line
20 of questioning. It's real clear you're relying on Boltz's
21 report, another document that has not been provided, and it
22 appears in this civil case anywhere I'm going to object.
23 It's not been disclosed to us ever. And it's pretty clear,
24 after watching this a few times, that you're relying on it
25 and questioning my client in a deposition with no

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1 forewarning at all. And this is what I call, I know you've
2 heard the term, sandbagging at minimum. It's borderline
3 bad faith, bar discipline type stuff.

4 It would be different if this was one small
5 thing, but we've got a distinct pattern here, and it
6 continues. You know, what's next? How many of these --
7 are there other civil documents, reports, things that are
8 going to be used in this case that have not been disclosed
9 to us?

10 MR. KENNER: Well, we can talk about that,
11 and I think we have, and I told you we'll give you what
12 we --

13 MR. JONES: After you conduct a deposition
14 on my client does not satisfy the civil rules, and I'm
15 going to move to strike this deposition more likely than
16 not. This should have been given -- I asked your
17 co-counsel a bunch of times if we would be provided, and I
18 was assured we would be provided of a copy of at least the
19 grand jury and his report at that time. Apparently you
20 have indicated to her, because I don't know what you guys
21 discussed, we're not getting it and you don't intend to
22 give it up. I think this is bad faith. And I'm getting
23 less pleased -- it's not your questioning, it's the fact
24 that you're relying on documents that we have no reference
25 to, that she has no reference to, and it's stuff that

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1 you're going to bring up in a civil case to oppose a
2 summary judgment motion that we haven't been given, and
3 we're entitled to that, period. You don't get to do your
4 Opposition to Motion for Summary Judgment and then say, oh,
5 by the way. We don't buy that.

6 MR. KENNER: Mr. Jones, my response to you
7 is that with respect to the police report and with respect
8 to the grand jury testimony, they are public documents,
9 they are equally available to you as they are to us, and
10 I'm not certain that it is correct that we have an
11 obligation to provide you with those things.

12 MR. JONES: The civil rules require initial
13 disclosures, which you've done none. You don't get to hold
14 back everything and say we are making no initial
15 disclosures, by the way -- at the end of this trial, by the
16 way, it was available to you. That's not how the rules
17 work, at least in this jurisdiction to the best of my
18 knowledge. And I might be wrong, and if so, I apologize.

19 MR. KENNER: You're making your record, I'm
20 making my record.

21 BY MR. KENNER:

22 Q. Do you remember saying to Detective Boltz -- let
23 me withdraw that.

24 Was your mother involved in a sex for drugs
25 scene with Mr. Boehm, Bolling, and Williams?

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1 A. I'm not the person to ask that. I don't know.

2 Q. Did you ever tell that to Detective Boltz? Did
3 you ever say to him --

4 A. Not that I recall.

5 Q. -- that your mother, Kathleen Purser, was involved
6 in a sex for drug scene with Boehm, Bolling, and Williams?

7 A. Maybe Boehm, but what would Bolling and Williams
8 want to do with that?

9 Q. I'm just asking you if you said that?

10 A. I don't remember saying that.

11 MR. JONES: Do you want to take a break?

12 THE WITNESS: I'm fine. I want to get this
13 over with. Unless you guys have --

14 MR. JONES: No, I'm all right.

15 BY MR. KENNER:

16 Q. Who is Victoria M. Nelson?

17 A. Victoria Nelson?

18 Q. Yes.

19 A. I couldn't tell you, I don't know.

20 Q. Victoria M. Nelson, MVIV, period, from the
21 Salvation Army?

22 A. Oh, Vickie Nelson. That was my counselor at
23 inpatient treatment.

24 Q. Kimmy Sventec (ph)?

25 A. A friend of mine that I brought over to Josef's

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1 once.

2 Q. How long did you know Kim Sventec?

3 A. A year maybe before I brought her over there.

4 Q. And do you know where she lives?

5 A. Not anymore.

6 Q. When is the last time you've had contact with her?

7 A. We had a passing in Fred Meyer maybe eight months
8 ago. I said hi, and that's it. We haven't really talked
9 since I brought her over to Josef's house.

10 MR. KENNER: I don't have any further
11 questions. Just a minute. I'm sorry let me go into one
12 other area.

13 MR. JONES: No problem.

14 BY MR. KENNER:

15 Q. Did you end up being the person who was cooking
16 the cocaine that was being used at Mr. Boehm's house?

17 A. I have done it. I have cooked crack cocaine.

18 Q. Did you become known as the crack connoisseur?

19 A. I referred to myself as that once, at one time.

20 Q. Do you recall, or was it true that you would
21 always talk Joe into letting you cook his dope for him
22 because you had a fetish with cooking crack?

23 A. Yeah, when I was using drugs I liked to cook it.

24 Q. Who taught you how to do it?

25 A. Watching Bambi and Josef.

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1 MR. KENNER: Can we just take one second
2 here.

3 MR. GREENFIELD: Why don't we take a break.

4 MR. JONES: That's fine, and you guys can
5 finish up after you get back.

6 VIDEOGRAPHER: Off record, 2:12.

7 (Off the record.)

8 VIDEOGRAPHER: We're on record at 2:24.

9 MR. KENNER: I don't have anything.

10 EXAMINATION

11 BY MR. JONES:

12 Q. I've got just a few. You're going to have to bear
13 with me, and this is not intentional, this is the way my
14 mind works. I don't do things in sequential, I kind of
15 jump back and forth. It's not meant to trick you, even
16 though you're my own client, just listen close.

17 It's my understanding, based on your
18 previous testimony, that the first time you smoked dope is
19 with Carl and your mother?

20 A. Yes.

21 Q. The second time was with Carl, and he took you to
22 a hotel, is that correct?

23 A. Yes.

24 Q. At the time that he took you to the hotel, were

25 you already high? Did you get high before you went to the

Page 130

1 hotel?

2 A. Yeah.

3 Q. So you were already high on crack for the second
4 time then, correct?

5 A. Yes.

6 Q. I think I recall you testifying that the third
7 time you smoked crack was with Bambi Tyree and Mr. Boehm?

8 A. Yes.

9 Q. Do you believe, in your opinion, that you were
10 addicted to crack just after smoking it two times?

11 A. No.

12 Q. Do you have an opinion as to about how long you
13 smoked -- how many times you had smoked crack with Mr.
14 Boehm before you felt you were addicted or you couldn't
15 quit?

16 MR. KENNER: Just for the record, I'm going
17 to object as it calls for speculation and an opinion.

18 BY MR. JONES:

19 Q. Let me rephrase it. After how many times of
20 smoking crack with Mr. Boehm did you feel you could not
21 leave?

22 MR. GREENFIELD: Objection, assumes facts
23 not in evidence.

24 BY MR. JONES:

25 Q. You can go with your own feelings. You can answer

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1 the question just because they object.

2 A. I can't tell you how many times. I mean, after a
3 certain period of smoking over and over again, I'd say
4 within two months I had started to get addicted.

5 Q. But this was the period of time, during the period
6 of time, within a few months that you might have gotten
7 addicted or you got addicted was with Mr. Boehm?

8 A. Yes.

9 Q. Did Mr. Boehm provide you the cocaine?

10 A. Yes, he did.

11 Q. Did you ever see Mr. Boehm pay for the cocaine?

12 A. Yes, I did.

13 Q. Did Mr. Boehm cook up the crack, the cocaine?

14 A. Yes. Most of the time it was already cooked, but
15 yes, I've seen him cook it up.

16 Q. The first time you went over to Mr. Boehm's place
17 that you guys smoked, refresh my memory, what was the
18 circumstances on the first time you met Mr. Boehm? You
19 went to his house?

20 A. Yes.

21 Q. Did he have cocaine there?

22 A. Yes. It was already crack cocaine.

23 Q. Tell me how this was set up. Did he have a crack
24 pipe with him or did Bambi bring the crack pipe?

25 A. He had a bunch of crack pipes with him.

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1 Q. At the time you met him, Mr. Boehm already had --
2 how many crack pipes would you say were there?

3 A. He had between 10 and 12. There was a lot. They
4 were all broken. And, you know, I mean there was a lot of
5 paraphernalia around.

6 Q. Were they little tubes of glass with Chore Boy in
7 them?

8 A. Yes.

9 Q. You know what Chore Boy is?

10 A. Yes.

11 Q. Do you know what a pigeon is in drug terms?

12 A. No.

13 Q. Have you ever heard the phrase that a pigeon is a
14 drug addict that they never go away, they always come back?

15 A. Uh-huh.

16 Q. Did you ever hear that term "pigeon"?

17 A. I've never heard that before, but I understand
18 what you mean definitely.

19 Q. When you tried to leave, would you always feel the
20 urge to come back?

21 A. Yes.

22 Q. Why?

23 A. Because I was addicted to drugs.

24 Q. Who fed you these drugs?

25 A. Josef Boehm.

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1 Q. Now if you withheld sex, would Mr. Boehm withhold
2 drugs?

3 A. Yes.

4 Q. No sex, no drugs?

5 A. Yes.

6 Q. Did he give you drugs before having sex?

7 A. Yes.

8 Q. Were there times that you had smoked so much that
9 you had seizures?

10 A. Yes.

11 Q. How many times would that occur?

12 A. I can't recall. I was just told about the
13 seizures after I came aware again.

14 Q. Where did this occur?

15 A. The first one was at Josef Boehm's house.

16 Q. Did he call the ambulance for you?

17 A. No.

18 Q. Do you know why? Only if you know why, don't
19 speculate.

20 MR. KENNER: Object, calls for hearsay.

21 BY MR. JONES:

22 Q. Only if you know why he didn't call. I don't want
23 you to guess or somebody told you.

24 A. I don't know why, I'm not in his head. I'm sure
25 he didn't want the cops coming to his house for an overdose

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1 of 15 year old.

2 MR. KENNER: Move to strike the last part of
3 the answer. No question pending.

4 BY MR. JONES:

5 Q. You said at some point, this van issue, at some
6 point you and Bambi went out and got in a van?

7 A. Yeah.

8 Q. Whose van was it?

9 A. It was Carl, Carl Bucher, whatever his name is,
10 Butcher.

11 Q. Had you ever been in his van before?

12 A. No, I don't think so.

13 Q. So you didn't know what was in the van?

14 A. No.

15 Q. You didn't know if there was any money in the van
16 or not?

17 A. No, I did not.

18 Q. Did you ever try to take money from Josef in an
19 attempt to get away from him?

20 A. Yeah. That's why I wanted to take money so I
21 could go be by myself and get high and not have to trade
22 sex for it.

23 Q. And did he catch you trying to take this money?

24 A. Yes, he did.

25 Q. What did he do to you?

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1 A. He chased me into his driveway and hit me in the
2 face before getting into the car that I got into.

3 Q. And did he ever -- did he make a threat to you at
4 that time about trying to take his money again or anything
5 to that effect? Did he say anything to you?

6 A. It was more just calling me names and screaming.

7 Q. When you guys first went to the Micro Hotel the
8 first time you went and stayed at the hotel, who paid for
9 that?

10 A. Josef.

11 Q. Did you ever force yourself on Mr. Boehm? Did you
12 ever want to have sex with him and try to have sex with
13 him?

14 A. No, I never forced myself on Josef.

15 Q. When you were high -- when you were not high did
16 you ever try to have sex with him?

17 A. No.

18 Q. Did you ever have sex with him when you weren't
19 high?

20 A. No.

21 Q. About how much did you weigh at that particular
22 period of time?

23 MR. GREENFIELD: What period of time,
24 counsel?

25 BY MR. JONES:

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1 Q. During the period of time you were --

2 A. Using.

3 MR. JONES: I'm sorry, good question.

4 BY MR. JONES:

5 Q. The period of time that you were staying with Mr.
6 Boehm and doing crack?

7 MR. GREENFIELD: What period of time was
8 that? Is that a year, is that a month, a week?

9 BY MR. JONES:

10 Q. You were there for how long you testified to, a
11 year or two?

12 MR. KENNER: Objection. Assumes facts not
13 in evidence.

14 BY MR. JONES:

15 Q. How long did this relationship with Mr. Boehm
16 consist of?

17 A. Over the course of -- definitely over two years,
18 almost three. Because I still contacted him while I was in
19 Seattle. But when I started smoking, I weighed roughly
20 110, 115 pounds. When I left for Seattle I weighed 85, if
21 that.

22 Q. Speaking of Seattle, who gave Mr. -- who took you
23 down to Seattle?

24 A. Leslie Williams.

25 Q. Do you know why? Don't speculate again. Do you

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1 know why he took you to Seattle?

2 A. I wanted to get away from drugs, and I had been
3 talking about getting off drugs for a while.

4 Q. Do you know who paid for this?

5 A. Josef Boehm.

6 Q. Do you know if this was after Mr. Boehm was being
7 investigated?

8 A. I didn't know for a fact he was being investigated
9 until I talked to the police after I was already in
10 Seattle.

11 Q. But in retrospect, was this during the period of
12 time that he was being investigated?

13 A. Yes.

14 Q. Now you testified that back then you believed that
15 Mr. Boehm was a victim of these people. As you sit here
16 today, do you believe that Mr. Boehm was a victim?

17 A. No, I don't.

18 Q. Have you received counseling for what occurred?

19 A. Yes, yes, I have.

20 Q. Who paid for that counseling?

21 A. My probation has paid for the counseling that I
22 got with out of this.

23 Q. Are some of the opinions that you've given here
24 today based on your counseling?

25 A. Yeah.

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1 Q. Some of the things that you've learned about
2 sexual assault victimization and stuff is based on your
3 counseling?
4 A. And why I feel that it's not okay that he did that
5 to me. It's changed, yeah.
6 Q. These are things you didn't know when you were 15
7 years old?
8 A. No. These are things I did not know.
9 Q. Now wasn't it, in fact, Josef Boehm that was
10 telling you when you were high, you testified to this, that
11 Bambi and them were conspiring against him?
12 A. Yes, it was Josef Boehm telling me that.
13 Q. Was he high at the time, too?
14 A. Yes.
15 Q. Did you notice one of the side effects of smoking
16 crack is that you're pretty paranoid?
17 A. Definitely.
18 Q. That you're looking out the windows that have
19 aluminum foil on them?
20 A. Uh-huh.
21 Q. Did you ever notice how you look down on the
22 floor -- even when you're not smoking it you look down on
23 the floor and you look for rocks, did you ever notice that?
24 A. Yes.
25 Q. Was that something that held over for a while even

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1 after you received treatment?
2 A. The paranoia would. I wasn't actively looking for
3 crack rocks on the floor after treatment.
4 Q. How about the -- you mentioned holding your breath
5 in your dream. Do you ever notice that when you're awake,
6 that you will catch yourself holding your breath?
7 A. Yeah, and thinking about it.
8 Q. You still think about it occasionally, don't you?
9 A. Yeah.
10 Q. Was it pretty oppressive? Was it pretty binding
11 on your mind at the time you were doing it?
12 A. What do you mean?
13 Q. Wouldn't you have done pretty much anything to
14 continue getting it?
15 A. Yes.
16 Q. And didn't that pretty much draw you back to Mr.
17 Boehm's house? Whenever you got a ways away from it, a
18 little bit of time went by, you feel that urge to go back
19 to his house?
20 A. Yes.
21 Q. Even if you had to crawl in the window to see if
22 anybody was home so you could get the crack?
23 A. Yes.
24 Q. How has it affected your ability to interact with
25 people, hold jobs, stuff like that?

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1 A. I haven't had a job for over three months.
2 Q. Well, you tried to get some hairdressing training,
3 didn't you?
4 A. Yeah.
5 Q. Pretty tough to hold on to that?
6 A. I did pretty good for a while, but I'm dropped out
7 right now, so.
8 Q. Now tell me what an A tool is?
9 A. It's a douche applicator.
10 Q. Tell me how this -- I've heard this phrase. Tell
11 me how this thing fits into this scenario?
12 A. Josef Boehm requested that I use this A tool. He
13 requested that I take a crack hit and blow the smoke from
14 my crack hit into his anus with the A tool.
15 Q. Who came up with this A tool?
16 A. Josef Boehm, as far as I know.
17 Q. Does it look like something that was made?
18 MR. KENNER: Move to strike the last answer
19 "as far as she knows". It's not based on personal
20 knowledge.
21 BY MR. JONES:
22 Q. When did you first see this A tool?
23 A. At Josef Boehm's house.
24 Q. Who had this A tool in their possession?
25 A. Josef Boehm.

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1 Q. Besides -- I know some of these things are not
2 good questions, but you have -- besides oral sex and
3 intercourse, what other things did Mr. Boehm have you do
4 A. With him?
5 Q. Uh-huh.
6 A. Just oral sex on him. I mean, we did oral sex on
7 each other.
8 Q. Did he use the A tool on you?
9 A. Yeah.
10 Q. Anal intercourse?
11 A. No. He never got hard enough.
12 Q. Was he taking Viagra?
13 A. Trying. It never worked. And if it did, he
14 couldn't ever orgasm anyway.
15 Q. Did the girls sometimes take his Viagra in order
16 to try to avoid having sex with him?
17 A. Not that I know of.
18 Q. Did he ever have you perform sex on other women?
19 A. Yes, he did.
20 Q. Did he like to watch?
21 A. Yes.
22 Q. Did he ever tell you that in the '80s he was
23 charged with a crime of assaulting a 15-year-old, or a
24 young lady?
25 A. He never told me that. He would also masturbate

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1 while he watched me perform sexual acts on other women.

2 Q. Let me backtrack a little bit. The first time
3 that you went -- that Bambi Tyree took you over to his
4 place, did he make any comments like, "It's a young girl,
5 get her out of here. This is not good"? Anything to
6 indicate that this was an inappropriate situation?

7 A. No. He stated that I was pretty cute, and to come
8 on in.

9 Q. Now these people that were coming and going most
10 of the time at Mr. Boehm's house, you've testified there
11 were quite a few. Were these mostly dealers he was dealing
12 with?

13 A. I'd say half and half, between girls and drug
14 dealers.

15 Q. So the young girls like yourself would show up and
16 then they would leave and then they would come back
17 periodically?

18 A. Yeah.

19 Q. Are there other -- do you know if there were other
20 young girls in the same relationship with Mr. Boehm as you?

21 A. Yes.

22 Q. Do you know about what their ages were?

23 A. One of them was 13.

24 Q. Were these always young girls that he wanted to
25 have sex with?

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1 A. Yeah. He wasn't interested in older women.

2 Q. Did he eventually stop having any interest -- let
3 me rephrase it.

4 Did he have an interest in Bambi Tyree when
5 you first met? Was he having sex with her, too?

6 A. Not that I know of. I don't know, I've never seen
7 them do anything. I think she might have, like, started
8 oral sex and that's what got me to do it, too, because I
9 didn't want to to begin with.

10 Q. About how old was she, do you know?

11 A. I don't know. 42, I think.

12 Q. Did you ever have sex over at AIH?

13 A. Yes, oral sex.

14 Q. With Mr. Boehm?

15 A. Yes.

16 Q. Which place?

17 A. Field one on 1st and Viking in the bathroom next
18 to his office.

19 Q. Did he provide any drugs there, too?

20 A. Yes, he did.

21 Q. Did you get high there?

22 A. Yes, we did.

23 Q. You indicated after you guys ate something after
24 being on a runner that you guys would go to sleep, correct?

25 A. Yeah.

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1 Q. How long after you woke up before Mr. Boehm would
2 provide you with more crack?

3 A. Right away.

4 Q. How many days in a row would you guys go doing
5 this?

6 A. I can't count. I think the longest I remember
7 staying up for was maybe eight days.

8 Q. So for eight days in a row this man provided you
9 crack cocaine to smoke?

10 A. He provided me a lot longer than that. It's just
11 a matter if I stayed awake or not.

12 Q. As long as he kept providing it would you keep
13 smoking it?

14 A. Yeah.

15 Q. Until you went out?

16 A. Yeah.

17 Q. I think we're about done.

18 MR. JONES: I am done, thank you.

19 FURTHER EXAMINATION

20 BY MR. KENNER:

21 Q. Ms. Purser, Mr. Boehm was not the only person that
22 you knew that could provide you with crack cocaine in
23 exchange for sex or money, isn't that true?

24 MR. JONES: Object. Assuming facts not in
25 evidence. You're once again stating sex --

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1 MR. KENNER: She already testified to Jay
2 Whaley and others.

3 MR. JONES: She wasn't trading -- well, I'm
4 not going to -- I'll let her answer it.

5 BY MR. KENNER:

6 Q. Let me withdraw and rephrase the question.

7 Would it -- there were other people that you
8 could have gotten crack cocaine from in exchange for money,
9 correct, besides Mr. Boehm?

10 A. Yes.

11 Q. There were other people you could have gotten
12 crack cocaine from in exchange for sex other than Mr.
13 Boehm, correct?

14 A. There was Jay Whaley, there was, and --

15 Q. Well, there was a lot of people. If you wanted to
16 look for them you could have found all kinds of them,
17 couldn't you?

18 A. Why would I go look for them when Josef was there.

19 Q. So you went to Josef because he was the most
20 convenient place to get what you wanted, is that correct?

21 A. He was the only one I knew of at that time.

22 Q. Well, you told us about Carl Bucher, correct, you
23 told us about doing crack cocaine with him, correct?

24 A. Yes.

25 Q. Having sex with him, correct?

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1 A. Yes.
 2 Q. You told him -- you told us that he paid for
 3 various of your expenses?
 4 A. Carl Bucher?
 5 Q. Maybe he didn't, but other people that you stayed
 6 with. Jay Whaley, when you stayed with him?
 7 A. Jay Whaley didn't make me have sex with him in
 8 order to get high with him.
 9 Q. But he gave you money?
 10 A. He gave me drugs.
 11 Q. He gave you drugs and he gave you a place to live?
 12 A. Uh-huh.
 13 Q. And he paid for your food and he paid for your
 14 expenses?
 15 A. He paid for my food.
 16 Q. So there were other places that you could go and
 17 people that you knew, aside from the people that you could
 18 have found if you wanted to, to provide sex or money in
 19 exchange for crack cocaine, correct?
 20 A. Okay, yes.
 21 Q. Is that correct?
 22 A. That's anywhere you go.
 23 Q. It's all over, right?
 24 A. Yes.
 25 Q. In Alaska there is a place here I understand

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1 called The Track where girls walk around and do acts of
 2 prostitution for crack cocaine or money, are you aware of
 3 that?
 4 A. I don't know much about The Track.
 5 Q. But you know about the place, you've heard about
 6 it?
 7 A. I've heard about The Track.
 8 Q. And you've heard that girls go there and get crack
 9 cocaine or get money for giving sex?
 10 A. From what I hear, they prostitute on Spenard.
 11 Q. Now you had a seizure at Mr. Boehm's house. You
 12 also had a seizure someplace else, didn't you?
 13 A. I also had a seizure at Jay Whaley's. I think
 14 I've had two seizures at Josef's.
 15 Q. And one at Jay Whaley's?
 16 A. Uh-huh.
 17 Q. Were you ever diagnosed as to what the cause of
 18 those were?
 19 A. No.
 20 Q. Mr. Boehm come to your -- well, when you had the
 21 seizure, did you know what was going on?
 22 A. No, I didn't remember having the seizure at all.
 23 Q. So you're not aware of whether or not Mr. Boehm
 24 gave you assistance and helped you through the seizure and
 25 to come through it?

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1 A. I don't remember any of that.
 2 Q. So as I understand the testimony that you have
 3 just given to your counsel, you made a decision to go to
 4 Mr. Boehm's house because that was the most convenient
 5 place for you to be able to get crack cocaine in exchange
 6 for sexual activity, is that correct?
 7 A. It was the easiest place to get crack cocaine,
 8 yes.
 9 Q. So in a sense you were using Mr. Boehm to get
 10 crack cocaine, is that correct?
 11 A. If that's how you see it, yeah, I guess.
 12 Q. Now at some point you made a decision that you
 13 wanted to clean up, correct?
 14 A. Yeah.
 15 Q. And was there any reason you didn't make that
 16 decision sooner?
 17 A. I did. I was sober for, like, four months.
 18 Q. Well, but you said you were going -- this three
 19 years, two or three years that you talked about seeing Mr.
 20 Boehm, you weren't living with him for two or three years,
 21 you'd see him sometimes and not see him other times, is
 22 that correct?
 23 A. Uh-huh.
 24 Q. And during any one of those times you could have
 25 made a decision not to see him anymore, correct?

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1 A. Yes.
 2 Q. And you didn't make that decision because you
 3 wanted to go back and get more crack?
 4 A. Yes.
 5 Q. Did you talk to your mother about this addiction
 6 problem that you had and look for her to help you get it
 7 solved?
 8 A. No. It was hard to talk with my mother about
 9 crack cocaine.
 10 Q. Did you talk to your aunt and uncle in Seattle or
 11 Spokane?
 12 A. No.
 13 Q. Did you talk to anybody in your family?
 14 A. No.
 15 Q. Did you talk to any counselors?
 16 A. Afterward, yes.
 17 Q. Well, I mean, when you were having this problem
 18 Were you happy with your life?
 19 A. No, but I was 15 years old, 16. I did not know
 20 what to do about it, so I just kept doing it. It was
 21 familiar.
 22 MR. JONES: I'll have just one followup.
 23 MR. KENNER: I have nothing further.
 24 FURTHER EXAMINATION
 25 BY MR. JONES:

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1 Q. One followup is, Mr. Boehm was the one that got
 2 you going on this, isn't this correct?
 3 A. Yes.
 4 Q. And you trusted him and that's why you went back
 5 to him?
 6 A. Yes.
 7 Q. And you felt he was the only place you could turn
 8 to, in light of how you felt about him at the time?
 9 A. Yes.
 10 Q. Did you feel you were controlled at that time?
 11 A. By the drug, yes.
 12 Q. Did you realize Mr. Boehm was, in fact,
 13 controlling you?
 14 A. Because he had the drug, yes.
 15 MR. KENNER: Objection, assumes facts not in
 16 evidence. That Mr. Boehm was --
 17 MR. JONES: Good objection, well taken.
 18 I'll withdraw that. No further questions.
 19 FURTHER EXAMINATION
 20 BY MR. KENNER:
 21 Q. You said that Mr. -- you trusted Jay Whaley,
 22 didn't you?
 23 A. Yes.
 24 Q. So Mr. Boehm wasn't the only person that you
 25 trusted?

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1 A. Not the only one.
 2 Q. So there were other people you trusted that you
 3 could have gotten crack cocaine from?
 4 A. Jay Whaley went to jail. So after he went to jail
 5 I stayed at his house maybe another three weeks with his --
 6 the lady he was living with. And then I went back to Josef
 7 because he kept showing up at Jay's house knocking on the
 8 door when I was the only one home during the day. So I
 9 finally just left and never came back and they brought me
 10 my belongings.
 11 Q. So you thought Mr. Boehm was the safest person to
 12 get crack from because you trusted him?
 13 A. I was the most comfortable getting drugs from him,
 14 because he had gave me some even though I didn't have
 15 money. Other people wouldn't give me drugs unless I had
 16 money.
 17 Q. What was the date that Mr. Whaley -- where you and
 18 Mr. Whaley were arrested?
 19 A. Sometime in May of 2004.
 20 Q. And then you went back to Mr. Boehm's house?
 21 A. Mr. Boehm was in jail in 2004.
 22 Q. So when you were arrested -- when Mr. Whaley was
 23 arrested you said Mr. Boehm kept coming to his house?
 24 A. He got arrested before we got caught together, and
 25 he ended up being my co-defendant and he went to jail. And

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1 he stayed in jail until after I left for Seattle. So I
 2 didn't see him any longer. And I don't know what the dates
 3 were then because I was still using.
 4 MR. KENNER: Thank you, nothing further.
 5 MR. JONES: Thank you, Eric.
 6 VIDEOGRAPHER: Close the record at 2:49.
 7 (Off the record.)
 8 VIDEOGRAPHER: We're on record at 2:50.
 9 MR. KENNER: Counsel, will you stipulate
 10 that the original of this deposition will be sent to your
 11 office, that you'll provide a copy to Mr. Purser, that she
 12 will have 30 days from the date that you receive the
 13 deposition to make any changes and corrections and to sign
 14 the document under penalty of perjury. That if we don't
 15 get it back within 30 days from that date, that we can use
 16 today's deposition as the true and correct record?
 17 MR. JONES: Wait a minute, what's this last
 18 part now?
 19 MR. KENNER: That if we don't get the
 20 corrected --
 21 MR. JONES: Oh, I see. Yeah, if we didn't
 22 send back the corrected version, yeah, we'll stipulate to
 23 that.
 24 MR. KENNER: If you don't send back the
 25 corrected version within 30 days we use this version as a

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1 true and correct copy?
 2 MR. JONES: Uh-huh.
 3 VIDEOGRAPHER: Off record counsel at 2:51
 4 (Proceedings concluded at 2:51 p.m.)
 5 (Exhibits A, B, C, & D mark'd for identification.)
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WITNESS CERTIFICATE

1
2 SALLEY PURSER Taken 12/12/06
3 I hereby certify that I have read the foregoing
4 deposition and accept it as true and correct, with
5 the following exceptions:
6

7 Page Line Description
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22 Date SALLEY PURSER
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24 (Use additional paper to note corrections as needed,
25 dating and signing each one.)

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CERTIFICATE

2 I, LEONARD J. DiPAOLO, Registered Professional
3 Reporter and Notary Public in and for the State of Alaska,
4 do hereby certify:
5 That the witness in the foregoing proceedings was by
6 me duly sworn; that the proceedings were then taken before
7 me at the time and place herein set forth; that the
8 testimony and proceedings were reported stenographically by
9 me and later transcribed under my direction by computer
10 transcription; that the foregoing is a true record of the
11 testimony and proceedings taken at that time; and that I am
12 not a party to nor have I any interest in the outcome of
13 the action herein contained.

14 IN WITNESS WHEREOF, I have hereunto set my
15 hand and affixed my seal this _____ day
16 of _____, 2006.
17
18
19

20 LEONARD J. DiPAOLO
21 Notary Public for Alaska
22 My Commission Expires: 2-3-2008
23
24
25

#1408

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4 EXAMINATION 129
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14 Exhibit B June 4, 2004 Interview (58 pgs - 153
15 14 condensed, 5 word index)
16 Exhibit C September 30, 2004 Interview 153
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20 Exhibit D Affidavit of Steven Boltz 153
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